

TSD File Inventory Index

Date: August 5, 2010

Initial: CMH/wao

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Note: Transmittal Letter to Be Included with Reports.

Comments:



Land and Chemicals Division

- Type of Document:
- ☐ Notice of Violation and Inspection Report/Checklist
 - ☐ No Violation Letter and Inspection Report/Checklist
 - ☒ Letter of Acknowledgment
 - ☐ Information Request
 - ☐ Pre-Filing and Opportunity to Confer
 - ☐ State Notification of Enforcement Action
 - ☐ Return to Compliance
 - ☐ Other Correspondence- NOD, memo to ORC

Facility Name: The University of Chicago
Street Address: 6054 S. Drapel Ave.
City: Chicago State: IL Zip Code: 60637

U.S. EPA ID#: ILD 005421136

Assigned Staff: _____ Phone: _____

Name	Signature	Date
Author <i>Sharrow</i>	<i>[Signature]</i>	8-2-10
Regional Counsel	N/A	
Section Chief <i>Tereza</i>	<i>[Signature]</i>	8/2/10
Branch Chief <i>Little</i>	<i>[Signature]</i>	8-5-10

MG
8/4

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter.
2. Make one copy of the contents of folder (including color photographs) for the official file.
3. Note that original inspection report, checklist & color photographs go to RCRA Fileroom.
4. Scan the letter, checklist and color photographs and save the file in the appropriate RB share drive folder.
5. Mail the original certified mail.
6. Distribute office copies (including report, checklist, and color photographs) to cc's and bcc's by email.

ORC - Kevin Chow

Once the certified mail receipt is returned:

7. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA Fileroom.
8. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

AUG 05 2010

LR-8J

CERTIFIED MAIL 7009 1680 0000 7665 2346
RETURN RECEIPT REQUESTED

Ms. Krista G. Cooley
Associate Director
Environmental Health and Safety Office
Risk Management, Audit and Safety Department
The University of Chicago
6054 South Drexel Avenue, Room 214
Chicago, Illinois 60637

Re: Notice of Violation
The University of Chicago
EPA ID. No.: ILD 005 421 136
6041 South Blackstone Avenue

Dear Ms. Cooley:

On May 13, 2010, a representative of the U.S. Environmental Protection Agency inspected The University of Chicago Laboratory Service Building facility located at 6041 South Blackstone Avenue in Chicago, Illinois. In response to violations of the Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR) identified during the inspection, EPA issued a Notice of Violation (NOV) to The University of Chicago on June 15, 2010. Subsequent to EPA's NOV, The University of Chicago submitted additional information regarding the identified violations on or about July 22, 2010.

This letter is to inform you that EPA has reviewed the referenced response and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA and the Illinois Environmental Protection Agency will continue to evaluate The University of Chicago in the future.

If you have any questions and/or concerns regarding this matter, please contact Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,

A handwritten signature in cursive script that reads "Paul J. Little". The signature is written in dark ink and is positioned above the printed name.

Paul J. Little
Acting Chief, RCRA Branch
Land and Chemicals Division

cc: Todd Marvel, Illinois Environmental Protection Agency

bcc: K. Chow, ORC (14J)



Land and Chemicals Division

Type of Document: ☒ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action
☐ Return to Compliance
☐ Other Correspondence- NOD, memo to ORC

Facility Name: "The University of Chicago" #249
Street Address: Mailing Address 6054 S. Drexel Facility Address: 6041 S. Drexel
City: Chicago State: IL Zip Code: 60637

U.S. EPA ID#: ILD005421136

Assigned Staff: D. Sharrow Phone: X 6-6199

Name	Signature	Date
Author <u>Sharrow</u>	<u>[Signature]</u>	<u>05-24-2010</u>
Regional Counsel <u>Chow</u>	<u>[Signature]</u>	<u>5-26-10 w/ comment & corrections</u>
Section Chief <u>Jerera</u>	<u>[Signature]</u>	<u>06/4/10</u>
Branch Chief <u>Setnicar</u>	<u>[Signature]</u>	<u>06/11/10</u>

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter.
2. Make one copy of the contents of folder (including color photographs) for the official file.
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K. Chow, ORC

Once the certified mail receipt is returned:

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUN 15 2010

LR-8J

CERTIFIED MAIL 7009 1680 0000 7665 1622
RETURN RECEIPT REQUESTED

Ms. Krista G. Cooley
Associate Director
Environmental Health and Safety Office
Risk Management, Audit and Safety Department
The University of Chicago
6054 South Drexel Avenue, Room 214
Chicago, Illinois 60637

Re: Notice of Violation
The University of Chicago
EPA I.D. No.: ILD 005 421 136
6041 South Blackstone Avenue

Dear Ms. Cooley:

On May 13, 2010, a representative of the U.S. Environmental Protection Agency inspected The University of Chicago Laboratory Service Building facility located at 6041 South Blackstone Avenue in Chicago, Illinois. The purpose of the inspection was to evaluate The University of Chicago's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on EPA's May 13, 2010, inspection that included personal observations made by the inspector, and a subsequent review of records and information provided by The University of Chicago personnel and contractors, EPA finds that The University of Chicago is engaged in the management of hazardous waste without a hazardous waste permit, and is in violation of the requirements of Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste treatment, storage or disposal permit, The University of Chicago must be in compliance with the conditions of 35 IAC § 722.134(a) and (c) [40 CFR § 262.34(a) and (c)].

Specifically, we find that The University of Chicago is in noncompliance with the following conditions for a hazardous waste storage permit exemption, and in violation of the following requirements:

1. A generator of greater than 1,000 kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the hazardous waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and must submit an Exception Report if the generator has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. See 35 IAC §§ 722.142(a)(1) and (a)(2) [40 CFR § 262.42(a)(1) and (a)(2)]. At the time of EPA's May 13, 2100, inspection, The University of Chicago could not locate copies of all manifests with the handwritten signature of the owner or operator of the designated facility from November 1, 2009 to April 9, 2010, and for such manifests failed to document contact with the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and submittals of any Exception Reports when it did not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

2. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must ensure that facility personnel complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with applicable hazardous waste storage facility performance standards and that they review such training annually. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (*including contingency plan implementation*) relevant to the positions in which they are employed. See 35 IAC § 722.134 (a) (4) and 725.116 (a)-(e) [40 CFR § 262.34 (a)(4) and 265.16 (a)(1)-(3), (b), (c), (d)(1)-(4) and (e)]. At the time of the inspection, The University of Chicago had not ensured that facility contract personnel, including contract staff from Wilpen Environmental Services, Incorporated, had completed a program of classroom instruction or on-the-job training that taught them to perform their duties in a way that ensures the facility's compliance with applicable hazardous waste storage facility performance standards, that they had reviewed such training annually, that the program was directed by a person trained in hazardous waste management procedures, and that the instruction had taught facility personnel hazardous waste management procedures (*including contingency plan implementation,*) relevant to the positions in which they are employed.

3. A large quantity generator of hazardous waste must also maintain the job title for each position at the facility related to hazardous waste management, the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and former employees. See 35 IAC § 722.134(a) (4) and 725.116 (a)-(e)

[40 CFR § 262.34 (a)(4) and 265.16 (a)(1)-(3), (b), (c), (d)(1)-(4) and (e)]. At the time of the inspection, The University of Chicago had not ensured that the job title for each position at the facility (specifically, for the contract employees from Wilpen Environmental Services, Incorporated), related to hazardous waste management, including the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and former employees were maintained.

4. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must maintain a copy of the contingency plan at the facility. See 35 IAC §§ 722.134 (a) (4) and 725.153 (a) [40 CFR § 262.34 (a) (4) and 265.53 (a)]. At the time of the inspection, a copy of The University of Chicago's Laboratory Service Building October 23, 2009 Contingency Plan was not maintained at 6041 South Blackstone Avenue, Chicago, Illinois 60637.

5. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must review and revise the facility contingency plan when the facility changes in a way that modifies the emergency response necessary, when information regarding the emergency coordinators changes, or when equipment changes. See 35 IAC § 722.134 (a) (4) and 725.154 (c), (d) and (e) [40 CFR § 262.34 (a) (4) and 265.54 (c), (d) and (e)]. At the time of the inspection, The University of Chicago's Laboratory Service Building October 23, 2009 Contingency Plan, had not been updated to reflect changes in the address (which should have been correctly and consistently identified 6041 rather than 6049 South Blackstone Avenue), the capability of the emergency equipment (contents of the spill kit), and the location of emergency equipment (spill kit should have been located inside rather than outside the facility).

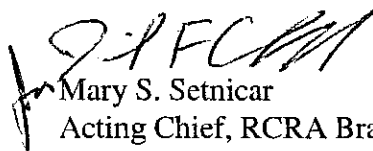
6. A large quantity generator of hazardous waste which accumulates hazardous waste on-site for 90 days or less, and which does not meet the conditions for a hazardous waste permit exemption of 35 IAC § 722.134 (a) [40 CFR § 262.34 (a)], is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See 35 IAC § 703.121(a) and (b), 703.180 (c) and 705.121 (a) [40 CFR § 270.1 (c), 270.10 (a) and (d)]. By virtue of its failure to comply with the exception reporting, training, and contingency plan requirements for a hazardous waste permit exemption, The University of Chicago became the owner or operator of a hazardous waste treatment, storage or disposal facility. The University of Chicago failed to apply for and obtain a hazardous waste storage permit, and The University of Chicago's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC § 703.121 (a) and (b), 703.180 (c) and 705.121 (a) [40 CFR § 270.1 (c), 270.10 (a) and (d)].

At this time, EPA is not requiring The University of Chicago to apply for a hazardous waste treatment, storage or disposal permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the RCRA, EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response to each of the violations noted above in writing to

this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements. However, please be advised that The University of Chicago's compliance with the conditions and requirements described above will not relieve The University of Chicago of its liability for the violations identified in this letter. EPA reserves the right to bring further enforcement actions (including an action for civil penalties) against The University of Chicago for the violations identified in this letter.

You should submit your response to Diane Sharrow, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Sharrow, of my staff, at (312) 886-6199.

Sincerely,


Mary S. Setnicar
Acting Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: The University of Chicago, Laboratory Service Building

U.S. EPA ID. No.: ILD 005 421 136

LOCATION ADDRESS: 6041 South Blackstone Avenue, Chicago, Illinois 60637

NAICS CODE: 61131 (Colleges, Universities and Professional Schools)
and 62211 (General Medical and Surgical Hospitals)

DATE OF INSPECTION: May 13, 2010

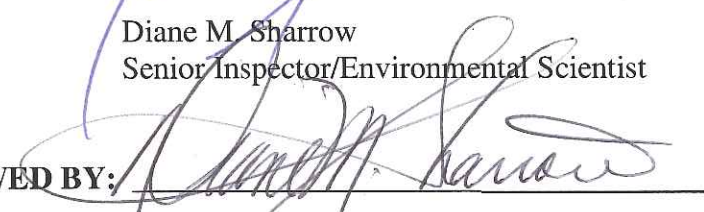
U.S. EPA INSPECTOR: Diane M. Sharrow

PREPARED BY:


Diane M. Sharrow
Senior Inspector/Environmental Scientist


Date

REVIEWED BY:


Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch


Date

Purpose of Inspection

The purpose of the inspection was to conduct a compliance evaluation inspection (CEI) at The University of Chicago and specifically, the Laboratory Service Building (LSB). The LSB is located at 6041 South Blackstone Avenue, Chicago, Illinois 60637.

Background

A CEI to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically those regulations related to the management of hazardous waste, was last conducted by Todd Brown of the United States Environmental Protection Agency (U.S. EPA) at The University of Chicago, and the LSB under U.S. EPA Identification Number (EPA ID No.) ILD005421136, on August 26, 2004. An attempt to conduct a CEI at ILD005421136 located at 960 East 58th Street (the location address specified in RCRA Info) was attempted on August 24, 2009, by Diane Sharrow of the U.S. EPA, but the LSB was not located at this address and the address could not be located. Ms. Sharrow also could not locate the owner or operator at the mailing address of 5555 South Ellis Avenue as was indicated in RCRA Info. A Request for Information was made by U.S. EPA to The University of Chicago on October 5, 2009, to determine the operation status of ILD005421136, as well as the following eight EPA ID Nos.: ILD005154778, ILR000114512, ILR000124008, ILR000124016, ILR000124024, ILR000129106, ILR000146787, and ILR000143750. The University of Chicago indicated in its November 5, 2009, response to the Request for Information that all EPA ID Nos., except for ILD005421136 were no longer active.

The University of Chicago (identifying itself as The University of Chicago Hospital) first notified U.S. EPA of its hazardous waste activities on or about August 18, 1980, and was issued EPA ID No. ILD005421136. The University of Chicago subsequently filed both the Part A and Part B portions of a RCRA hazardous waste permit application, and was issued a final permit by U.S. EPA on July 15, 1991, with an effective date of August 19, 1991. A Closure Plan and Final Closure were approved by the Illinois Environmental Protection Agency (Illinois EPA) on June 30, 2005, with clean closure verification on July 18, 2006. The University of Chicago also appears to have been assessed for purposes of corrective action, and solid waste management units (SWMUs) and areas of concern (AOCs) were identified. A copy of the corrective action RCRA Facility Assessment (RFA) is located in U.S. EPA's files.

Facility Description

The University of Chicago is located near Lake Michigan on the near southside of Chicago. The University of Chicago is a private teaching and research institution that includes a Medical Center or Hospital. The LSB is located on the south-east end of campus at 6041 South Blackstone Avenue (Photographs 1-28). The LSB is a stand-alone building with eight rooms, including a wash room, hall, work area, waste holding room, and separate storage rooms for oxidizers, toxics, acids and flammables.

Hazardous waste is not accepted at the LSB from off-site. Hazardous waste is generated on campus from a variety of sources, but primarily from laboratory, research and medical activities. Hazardous wastes are generated by greater than 1,000 locations, many on an infrequent basis. A university generator calls the Environmental Health and Safety Office and requests a pickup. Requests are tracked in a database, and the waste is picked up by the university contractor, Wilpen Environmental Services, Incorporated (Wilpen), and taken to the LSB. Wilpen manages the container storage at the LSB, and generates and prepares all manifests and Land Disposal Restriction (LDR) forms for The University of Chicago, prior to transport off-site to a licensed treatment, storage and disposal facility (TSDF). Wilpen does not analyze wastes, unless it is an unknown. It is analyzed or identified by the generator prior to pickup.

Opening Conference

I arrived at the 6000 block of South Blackstone Avenue at approximately 9:30 AM. I could not locate the LSB at 6049 as noted on the figure attached to the October 23, 2009, Contingency Plan submitted by The University of Chicago on November 5, 2009 in response to U.S. EPA's Request for Information. I noted several other addresses including 6041 (Photograph 25). I walked north of 6041 and then walked south to the end of the cul-de-sac on Blackstone Avenue. I then entered an open door at the building south of 6041 posted "No Admittance" and presented my enforcement credentials to a man working in the area (Photograph 26). I asked him if he could tell me where the LSB was located. He indicated it was located at 6041 and walked me to an open door on the east side of 6041.

I noted two men working at 6041 and presented my enforcement credentials to them. I explained that I wished to conduct an unannounced hazardous waste inspection that included a visual site inspection (VSI) and a records review. One of the men introduced himself as Joe Sapienza of Wilpen. He indicated that he worked for Wilpen and that every Thursday, Wilpen picks up and brings hazardous waste to the LSB, and that approximately every three weeks a transporter arrives to pickup the hazardous waste and deliver the hazardous waste to Environmental Enterprises in Cincinnati, Ohio. Mr. Sapienza also offered to accompany me on a VSI. I told him that I wished to contact The University of Chicago staff prior to beginning the VSI.

Mr. Sapienza led me into the LSB and pointed out a list of telephone numbers taped to the wall of the Work Area (Photographs 16, 17, 18 and 27). He pointed out the general number for Environmental Health and Safety (EHS). I called EHS on my cellular telephone and explained that I wished to conduct an unannounced hazardous waste inspection that included a VSI and a records review, but wished to have a representative of The University of Chicago accompany me. She placed me on hold, and a few minutes later she indicated that a representative would be there in about ten minutes. I relayed this information to Mr. Sapienza, and he again offered to show me around the LSB.

Visual Site Inspection

About ten minutes later, Sarah Grover of The University of Chicago arrived. I presented my enforcement credentials to Ms. Grover and I explained that I wished to conduct an unannounced hazardous waste inspection that included a VSI and a records review. She agreed to escort me on the VSI. I started the VSI in the Hall of the LSB (Photograph 1) at the Oxidizers Waste Storage Room (Photographs 2 and 3), proceeded to the Toxics Waste Storage Room (Photographs 4-6), and then proceeded to the Acids Waste Storage Room aka Corrosives (photographs 7-9). I then entered the Flammable Waste Storage Room (Photographs 10-12). I noted that the fire extinguishers in the Flammable Waste Storage Room had recently been checked (Photograph 13). I then moved into the Hall and to the Work Area. I asked Ms. Grover and Mr. Sapienza about why containers of the flammable hazardous waste were in the Hall (Photographs 1, 14 and 28). They indicated that the amount of hazardous waste required use of the Hall and Work Area for storage. I entered the Work Area (Photographs 15-19), and Mr. Sapienza pointed out a container of water reactive waste (Photograph 19).

I asked about the emergency information I observed posted on the wall of the Work Area with grey duct tape. Mr. Sapienza and Ms. Grover indicated that this information (Photographs 1, 17-18 and 27) had been prepared and posted by Wilpen. I asked to photograph the information and I also noted that the information did not match the information in the October 23, 2009, Contingency Plan previously submitted by The University of Chicago. I then returned to the Waste Holding Room where Wilpen was finishing up the lab packing of hazardous waste containers (Photographs 20 -21). We then walked outside where Mr. Sapienza pointed out that the containers on the east and north side of the LSB were empty (Photographs 22 and 23). During the VSI, I did not note any labeling violations or storage greater than 90 days. I did note that there was yellow spill-response kit outside.

Ms. Grover then agreed to lead me in her vehicle to the Environmental Health and Safety Office located at 6054 South Drexel Avenue, where I could conduct the Records Review portion of the CEI. On the way to my vehicle I took Photographs 25 and 26.

Records Review

Ms. Grover met me in the lobby of 6054 South Drexel. We took the elevator to the Environmental Health and Safety Office and convened in a conference room. We were joined by Melissa Jackson of The University of Chicago. I presented my enforcement credentials to Ms. Jackson. At this time I also gave Ms. Grover the following documents: the U.S. EPA OECA Small Business Information Sheet, the U.S. EPA Region 5 List of Pollution Prevention Contacts, and the Illinois Sustainable Technology Center Brochure. Midway through the Records Review we were joined by Krista Cooley, who stayed for a portion of the Record Review, left and then returned for the Closing Conference. I presented my enforcement credentials to Ms. Cooley.

During the Record Review I focused on records created since the Request for Information. I reviewed hazardous waste manifests as well as accompanying LDR certifications; annual reports; personnel training program records; contingency plan and inspection records.

Ms. Grover and Ms. Jackson explained that The University of Chicago trains all staff on its Chemical Hygiene Plan once when hired, and again if unsafe practices are found. They also indicated that there were a total of ten staff in their immediate office: Steve Beaudoin, Krista Cooley, Hugo Rodriguez, Christopher Harvey, Paula Dillon, Kevin Rohrer, Tom Hosack, and Jill Singleton, the receptionist, in addition to Ms. Jackson and Ms. Grover. They also provided me with a copy of job descriptions and Mr. Beaudoin's and Ms. Cooley's certificates of annual hazardous waste management training (March 11, 2010), but were unable to provide documentation that Wilpen or other staff had been trained on implementation of The University of Chicago's Contingency Plan.

I noted in my review of manifests that the copies signed by the TSD were not available. Ms. Jackson indicated that they probably had been received, but had not yet been matched to the generator copies. I also noted, and Ms. Jackson and Ms. Grover confirmed that The University of Chicago uses Midwest Environmental Transporters and that only Ms. Cooley and Mr. Beaudoin sign the manifests and submit the Annual Reports.

I also asked if staff or Wilpen inspect the LSB building on a weekly basis. Ms. Jackson and Ms. Cooley indicated that the four industrial hygienists take turns conducting the weekly inspections and I reviewed eight weeks of documentation. I also asked if the storage of hazardous waste in the Hall and Work Area at the LSB was common, as I was concerned about aisle space. They indicated it was not, but depended on generation and laboratory cleanouts, etc.

I asked Ms. Cooley and Ms. Jackson about whether there was a copy of the Contingency Plan at the LSB. They indicated that they thought there was and that it was in the Fire Department Information Center Box located outside the 6041 entrance door (Photograph 24). We agreed that at the close of the Records Review, Ms. Cooley and I would return to the LSB and verify whether the Contingency Plan was at the LSB in the Fire Department Information Center. Ms. Cooley indicated that copies of the Contingency Plan had been sent to the local emergency authorities.

Closing Conference

Ms. Cooley rejoined us as part of the Closing Conference. I indicated that I would send a letter to The University of Chicago, along with the inspection report, checklist and photographs in the next few weeks. I asked if I should send the documents to Ms. Cooley, and she said yes. I also asked Ms. Cooley if The University of Chicago could schedule more frequent shipments of hazardous waste, or whether it was a cost determination, because I was concerned about aisle space, access to emergency response equipment and that the Spill Kits should be stored on the inside of the LSB. She indicated that cost was not a factor and that shipments could be scheduled more frequently to ensure aisle space of at least three feet was maintained. I also indicated that the address of the LSB on the diagram attached to Contingency Plan was incorrect (6049). I concluded the CEI at approximately 12:45 PM and departed with Ms. Grover to return to the LSB.

Contingency Plan at the LSB

When Ms. Grover and I returned to the LSB, we found that there was not a copy of the Contingency Plan in the Fire Department Information Center Box (Photograph 24). Ms. Grover placed a copy in the Box. We then entered the LSB and placed a copy of the Contingency Plan in the Work Area where Wilpen was still working. Mr. Sapienza indicated that he had prepared the emergency information posted by Wilpen, and could revise it to reflect the Contingency Plan. Ms. Grover then asked about the placement of the Spill Kit outside the LSB and Mr. Sapienza indicated it would be returned to the interior of the LSB. I then departed the LSB at approximately 1:30 PM.

ATTACHMENT(S):

Inspection Checklist
Photographs (28)

Installation Name: **U of C**
 Date of Inspection: **5/13/10**

Location Address: **Check 6049 or 6041**
 U.S. EPA Inspector:
 Diane Sharrow

EPA ID Number: **ILD005421136**

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.) SUBPART A: GENERAL Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <u>4</u> No <u> </u> N/A <u> </u> Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <u>4</u> No <u> </u> N/A <u> </u>	722.111 <i>Wulpen Env Services, Inc</i> <i>only id unknowns</i> <i>offensive generator provides info on chemical waste pickup database</i> <i>Wulpen generator Manifest / LDR.</i>
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <u> </u> No <u> </u> N/A <u> </u>	808.121(a) <i>Did not evaluate</i>
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <u>4</u> No <u> </u> N/A <u> </u>	722.112(a) <i>see file on ID "Confusion"</i>
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <u>4</u> No <u> </u> N/A <u> </u>	722.112(c)
	SUBPART B: THE MANIFEST Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <u>4</u> No <u> </u> N/A <u> </u>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <u>4</u> No <u> </u> N/A <u> </u>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <u> </u> No <u>4</u> N/A <u> </u>	722.120(b)
722.121(a)	Section 722.121 Acquisition of Manifests Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <u>4</u> No <u> </u> N/A <u> </u>	722.120(d) 722.121(a) <i>Use Uniform Manifest</i>
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <u>4</u> No <u> </u> N/A <u> </u> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <u>4</u> No <u> </u> N/A <u> </u>	722.121(b)
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <u>4</u> No <u> </u> N/A <u> </u>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <u>4</u> No <u> </u> N/A <u> </u> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <u>4</u> No <u> </u> N/A <u> </u> - retained one copy as required by Section 722.140(a)? Yes <u>4</u> No <u> </u> N/A <u> </u> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <u>4</u> No <u> </u> N/A <u> </u>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <u>4</u> No <u> </u> N/A <u> </u>	722.123(b)

Installation Name:

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	<p>- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	722.123(c)
722.130	<p>SUBPART C: PRE-TRANSPORT REQUIREMENTS</p> <p>Is there any hazardous waste ready for transport off-site? <u>X</u></p> <p>Yes _____ No _____ N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C? <u>X</u></p> <p>Yes _____ No _____ N/A _____</p>	722.130
(722.134(a))	<p>Section 722.134 Accumulation Time</p> <p>Has the generator complied with the following requirements? <u>X</u></p> <p>Yes _____ No _____ N/A _____</p>	
(722.134(a)(1))	<p>A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? <u>X</u></p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? <u>NOT tanks</u></p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? <u>No Drip Pads</u></p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? <u>No Containment Bldg.</u></p> <p>Yes _____ No _____ N/A _____</p>	<p>Miles Midwest Env. Transporters & Wulper Env. Services Inc.</p>
(722.134(a)(2))	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? <u>checked date 4/11/10</u></p> <p>Yes <u>X</u> No _____ N/A _____</p>	
(722.134(a)(3))	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? <u>No Tanks</u></p> <p>Yes <u>X</u> No _____ N/A _____</p>	
(722.134(a)(4))	<p>Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? <u>see checklist</u></p> <p>Yes _____ No _____ N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers? <u>X</u></p> <p>Yes <u>X</u> No _____ N/A _____</p> <p>If "No", go to Subpart J.</p>	
(725.211) 214)	<p>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</p> <p>Has the generator closed an accumulation area? <u>many years ago</u></p> <p>Yes <u>X</u> No _____ N/A _____</p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? <u>X</u></p> <p>Yes <u>X</u> No _____ N/A _____</p>	<p>725.211</p> <p>725.214</p>

Installation Name:

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <u>X</u>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <u>X</u> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <u>X</u> No _____ N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>X</u> No _____ N/A _____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <u>X</u> No _____ N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <u>X</u> No _____ N/A _____	NOTE: 1 of staff inspect weekly as well as w/ 1 per. the Contractor
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <u>X</u> No _____ N/A _____ Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <u>X</u> No _____ N/A _____ COMMENTS:	
(725.278)	Section 725.278 Air Emission Standards Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <u>X</u> No _____ N/A _____ Comments: <u>only</u> Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No <u>X</u> N/A _____ Note: If "No", go to Subpart C. <u>No Tanks</u>	
(725.211) (725.214)	SUBPART J: TANK SYSTEMS Has the generator closed an accumulation area? Yes _____ No _____ N/A _____ If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A _____	725.211
		725.214

No Tanks

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:
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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes _____ No _____ N/A _____</p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291(a))	<p>For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____</p>	
(725.291(b))	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____</p> <p>2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____</p> <p>3) existing corrosion protection measures? Yes _____ No _____ N/A _____</p> <p>4) documented age of the tank system? Yes _____ No _____ N/A _____</p> <p>5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____</p> <p>*IRPE = Independent Registered Professional Engineer</p>	
(725.291(c))	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____</p> <p>Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	

No tanks

Installation Name:

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.292(a))	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?</p> <p>Yes _____ No _____ N/A _____</p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____</p> <p>2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____</p> <p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____</p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____</p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____</p>	
(725.292(g))	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	

No tanks

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____</p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes _____ No _____ N/A _____</p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____</p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____</p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	

No tanks

Installation Name:

Location Address:

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A _____	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes _____ No _____ N/A _____ 2) overflow prevention controls? Yes _____ No _____ N/A _____ 3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A _____	
(725.294(c))	Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overflow/spill control equipment? Yes _____ No _____ N/A _____ 2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A _____ 3) data from monitoring equipment? Yes _____ No _____ N/A _____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A _____	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A _____	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A _____	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____ b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____ Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	

No tanks

Installation Name:

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____ - Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	

no tanks

Installation Name:

Location Address:

EPA ID Number:

(a)

Date of Inspection:

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____ If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ COMMENTS: <i>no tanks</i>	
(725.302)	Section 725.302 Air Emission Standards Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A _____ Comments: <i>NA No Tanks</i>	
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No _____ N/A _____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____ d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? <i>Verification</i> Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No _____ N/A _____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No _____ N/A _____ <i>Tight</i>	

Using table & database to show 3/4" of aisle space

increase # of conts

(Fume hood labeled ashag or organic waste → note in the database so contractor knows where to go)

Installation Name:

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EPA ID Number:

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation <i>NOTE</i>
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<p>U of C.P.D. C.F.D. → annual walk through. First Responders are U of C staff → are they Nat trained. U of C Hosp.</p>
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	<p>Is the contingency plan available? <i>October 23, 2009</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>Dore Wilper have a copy?</i></p> <p>If "No", skip to Section 725.155.</p> <p>Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>no</i></p>	
(725.151(b))	<p>Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	
(725.152(a))	<p>Does the plan describe the actions required for response to:</p> <ul style="list-style-type: none"> - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>✓ spill kits</i> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	<p><i>Spill kits not where 725.152(e) requires</i></p> <p><i>wrong address "6049" "6041"?</i></p>
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	

Copy of C.P. in Fires Resp. Box → checked on Friday.

No placed copies.

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <u>not at Central accum. area</u> No _____ N/A _____</p> <p>b) submitted to:</p> <p>- police department? Yes <u>✓</u> No _____ N/A _____</p> <p>- fire department? Yes <u>✓</u> No _____ N/A _____</p> <p>- hospital? Yes <u>✓</u> No _____ N/A _____</p> <p>- emergency response teams? Yes _____ No _____ N/A <u>✓</u></p>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <u>annually</u> No _____ N/A _____</p> <p>b) the plan fails in an emergency? Yes _____ No <u>✓</u> N/A _____</p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes <u>✓</u> No _____ N/A _____</p> <p>d) information regarding emergency coordinators changes? Yes <u>✓</u> No _____ N/A _____</p> <p>e) information regarding equipment changes? Yes <u>see note on spill kits</u> No _____ N/A _____</p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <u>✓</u> No _____ N/A _____</p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <u>✓</u> No _____ N/A _____</p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <u>✓</u> No _____ N/A _____</p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes _____ No <u>✓</u> N/A _____</p> <p>Note: If the facility has had a release, explain in detail.</p>	

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? <i>Chemical Hygiene Plan</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>Hay Mat / Changes - sugg initialing</i> <i>see note about</i> <i>contractor</i></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>DOT - paperwork</i></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>see note on CP</i> procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>no CP records of CP</i> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:
Diane Sharrow*restricted wastes*

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____	<i>some labs have more than once a week pickup</i>
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
722.140(a)	SUBPART D: RECORDKEEPING AND REPORTING Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes _____ No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)

*Manifests are "e-filed"**Chemical Inventory given to staff each year. Rate that is unknown**Something generated by the lab themselves -> this is what it consist of the info stored in the access database.*

Installation Name:

Location Address:

EPA ID Number:

Date of Inspection:

U.S. EPA Inspector:

Diane Sharrow

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.141(b)
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? <i>none?</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>X?</i>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? <i>none? Missing TSD signed copies</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>X?</i>	722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>X</i>	722.143
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <i>X</i> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>X</i>	722.150
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <i>X</i> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>X</i>	722.160
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <i>X</i> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.170

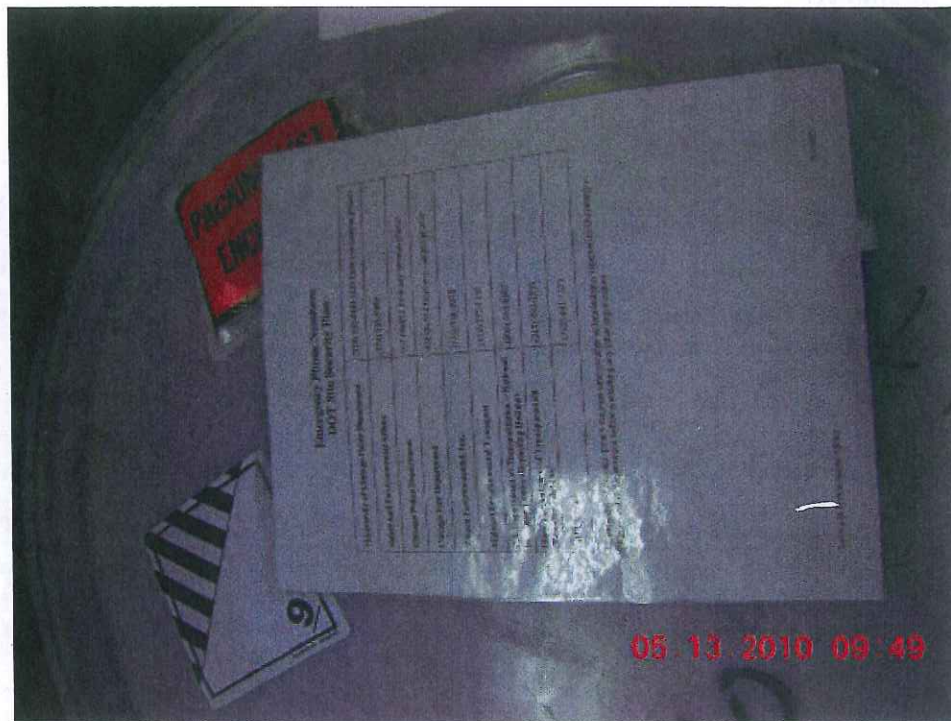
Photographs for University of Chicago

Media: RCRA

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Photo Number 27
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Date/Time 5/13/2010
9:49:12 AM
Photographer Diane Sharrow

Description

Univeristy of Chicago, Laboratory Services
Building - Wilpen Emergency Information



Photographs for University of Chicago

Media: RCRA

Disk Number 2
Photo Number 28
Photo Filename DSCN0903.JPG
Date/Time 5/13/2010
9:49:40 AM
Photographer Diane Sharrow

Description

Univeristy of Chicago, Laboratory Services
Building - Interior of Work Area facing
east - excess storage.



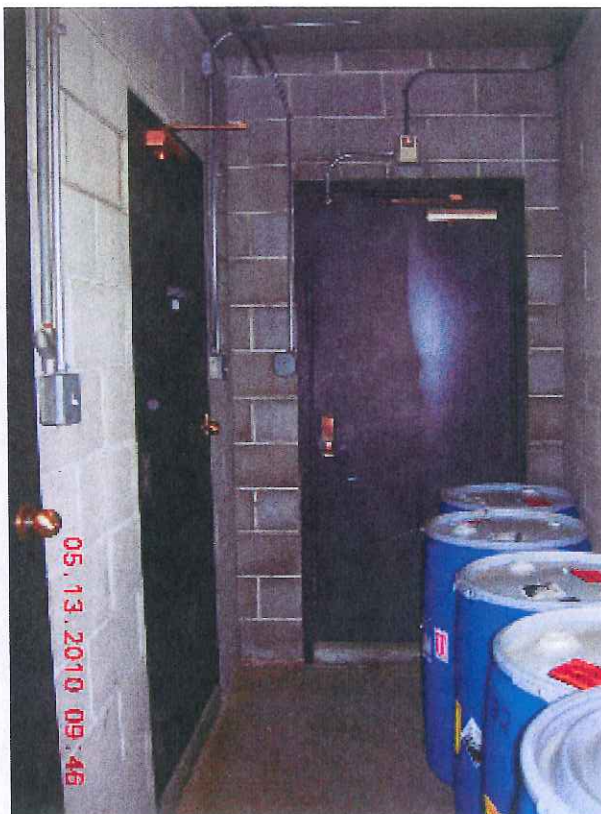
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Media: RCRA

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Photo Number 1
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Date/Time 5/13/2010
9:46:08 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Internal central hall facing west -
exit door (note absence of exit sign).



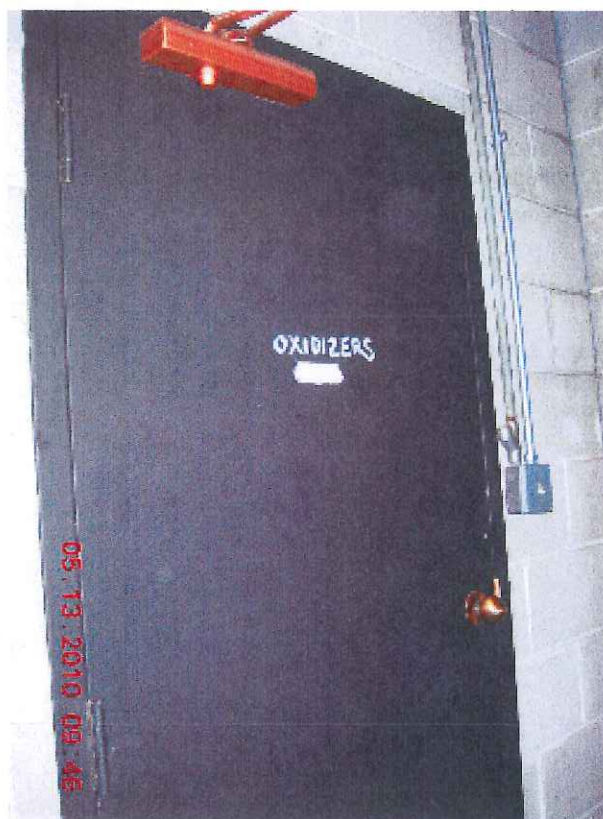
Photographs for University of Chicago

Media: RCRA

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Date/Time 5/13/2010
9:46:20 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Exterior Door of Oxidizers
Waste Storage.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN0886.JPG
Date/Time 5/13/2010
9:46:30 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Oxidizers Waste
Storage Room.



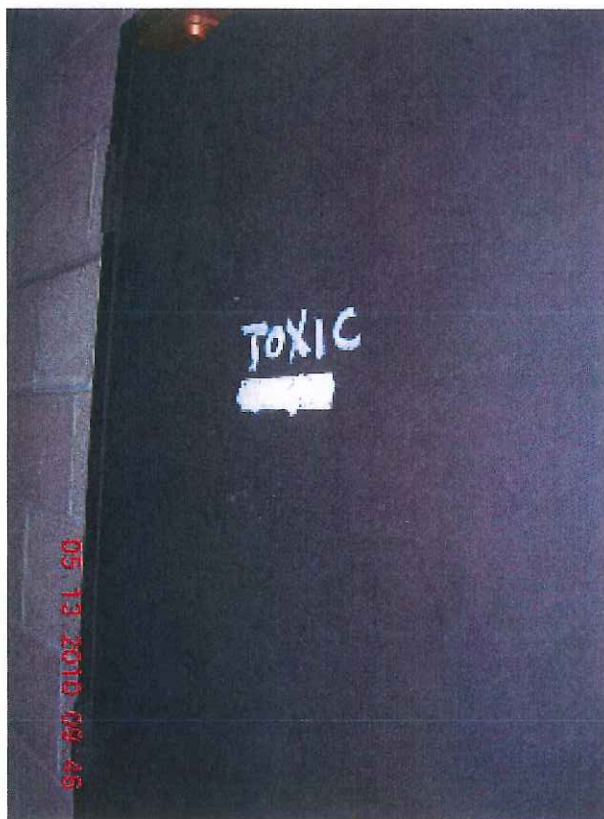
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Media: RCRA

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Photo Filename DSCN0887.JPG
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9:46:40 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Exterior Door of Toxic Waste
Storage Room.



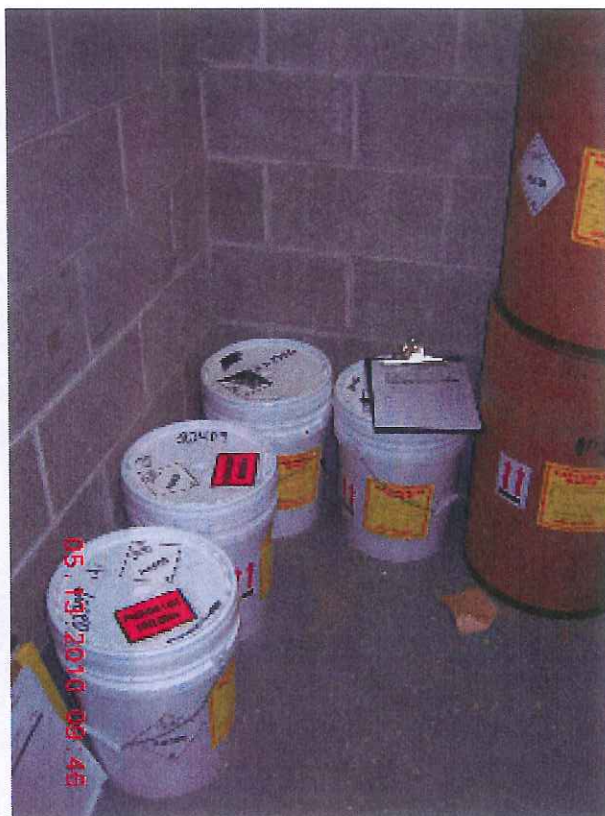
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Media: RCRA

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Photo Filename DSCN0888.JPG
Date/Time 5/13/2010
9:46:46 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Toxics Waste Storage
Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 6
Photo Filename DSCN0889.JPG
Date/Time 5/13/2010
9:46:58 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building -Interior of Toxics Waste Storage
Room.



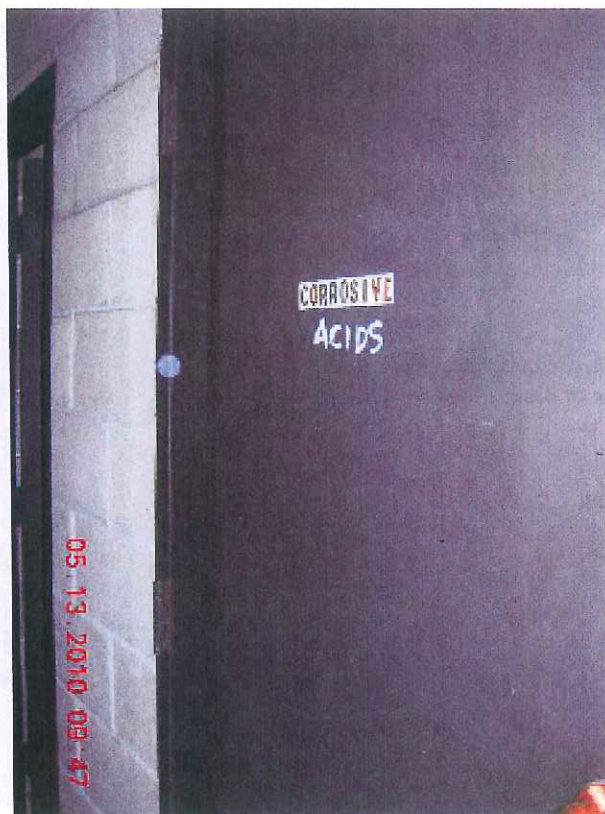
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Media: RCRA

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Photo Filename DSCN0890.JPG
Date/Time 5/13/2010
9:47:08 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Exterior Door of Acids /
Corrosives Waste Storage Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 8
Photo Filename DSCN0891.JPG
Date/Time 5/13/2010
9:47:16 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Acids / Corrosives
Waste Storage Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN0892.JPG
Date/Time 5/13/2010
9:47:22 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Acids / Corrosives
Waste Storage Room.



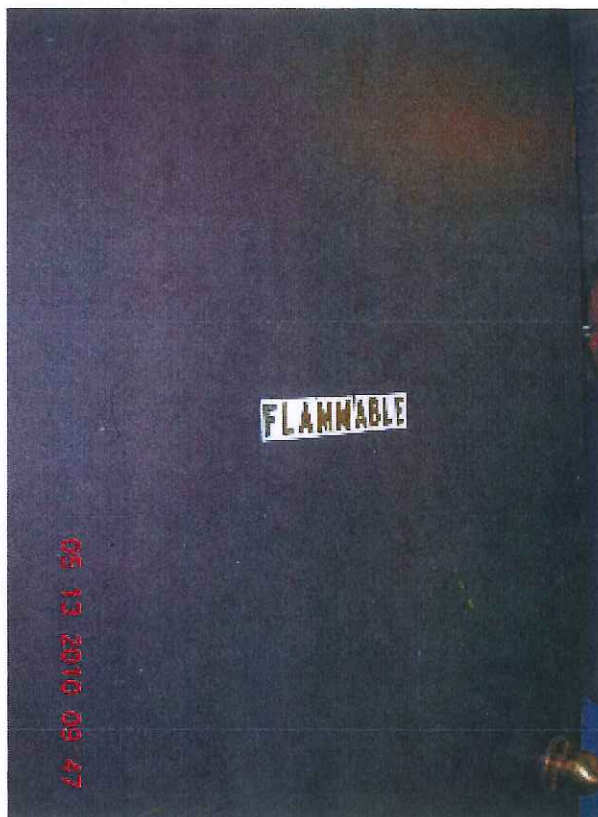
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Media: RCRA

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Date/Time 5/13/2010
9:47:30 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Exterior Door of Flammable
Waste Storage Room.



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Media: RCRA

Disk Number 1
Photo Number 11
Photo Filename DSCN0894.JPG
Date/Time 5/13/2010
9:47:50 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Flammable Waste
Storage Room facing west.



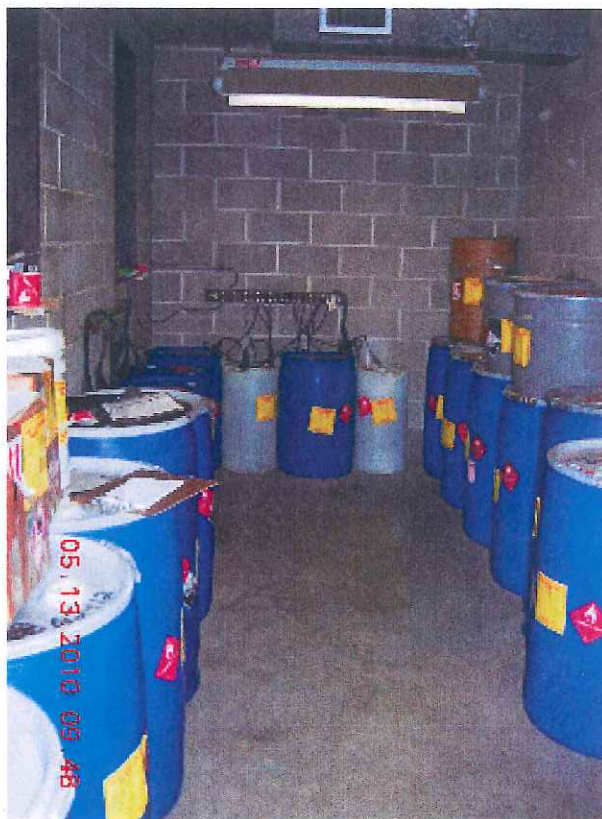
Photographs for University of Chicago

Media: RCRA

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9:48:02 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Flammable Waste
Storage Room facing east.



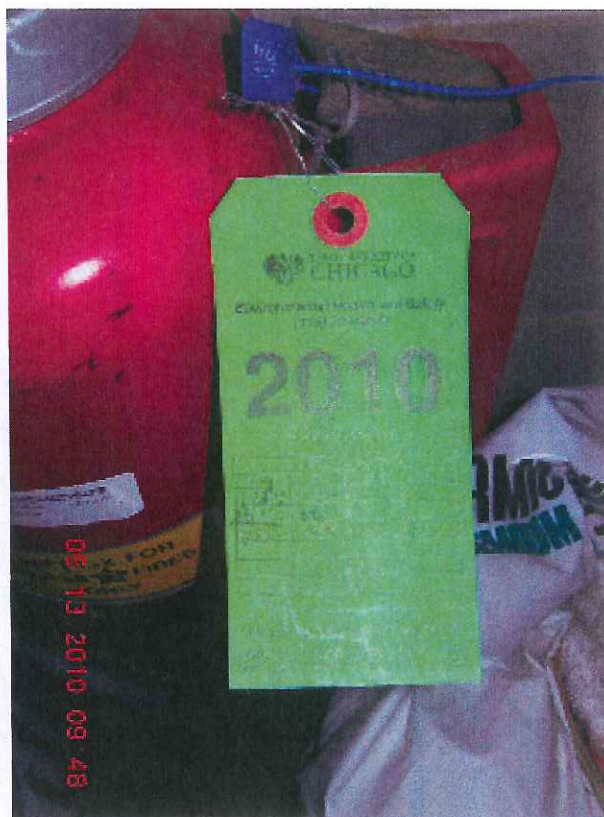
Photographs for University of Chicago

Media: RCRA

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9:48:18 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior fire extinguisher service
tag.



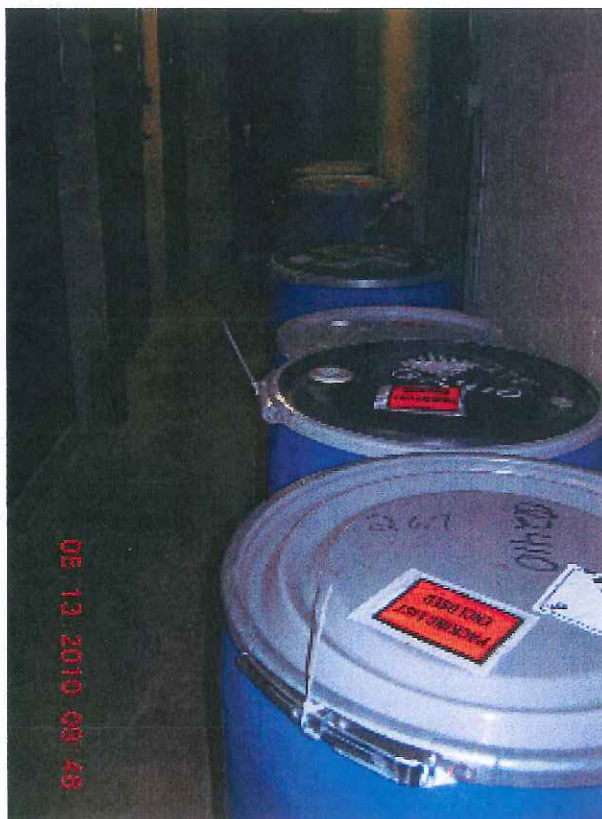
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Media: RCRA

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Date/Time 5/13/2010
9:48:30 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior Hall - facing east -
excess Flammable Waste Storage.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 15
Photo Filename DSCN0898.JPG
Date/Time 5/13/2010
9:48:46 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Work Area facing
west to exit door - excess storage.



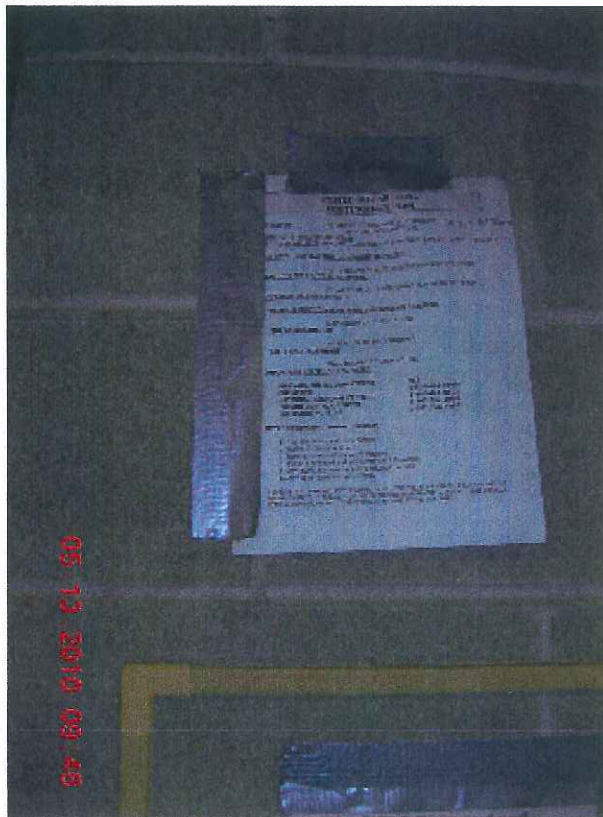
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 16
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9:48:52 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Wilpen Emergency Information
on north wall of Work Area.



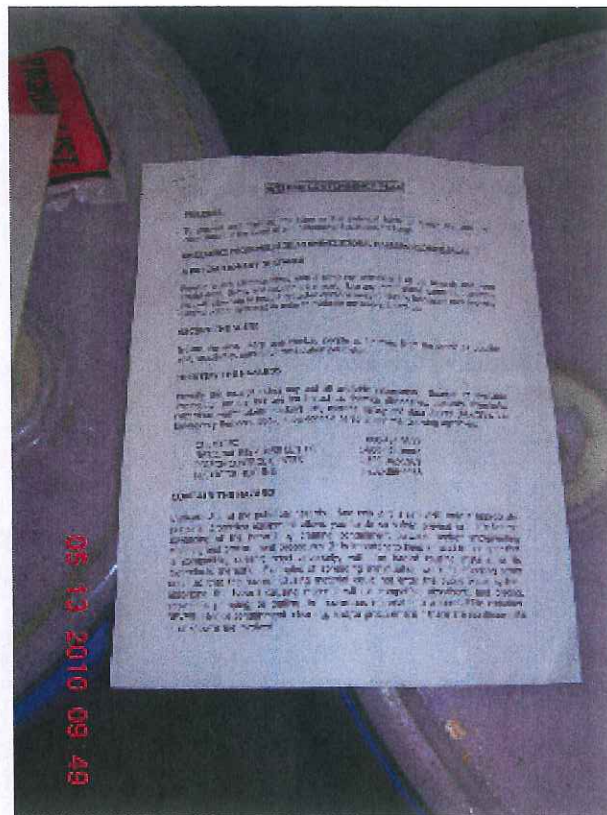
Photographs for University of Chicago

Media: RCRA

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Photo Filename DSCN0901.JPG
Date/Time 5/13/2010
9:49:18 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Wilpen Emergency Information
in Work Area Page 1.



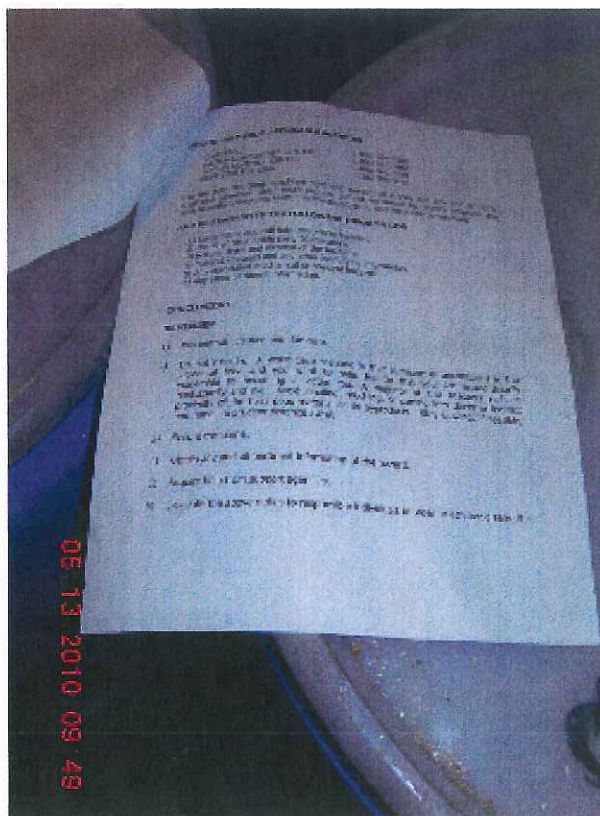
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Media: RCRA

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Date/Time 5/13/2010
9:49:24 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Wilpen Emergency Information
in Work Area Page 2.



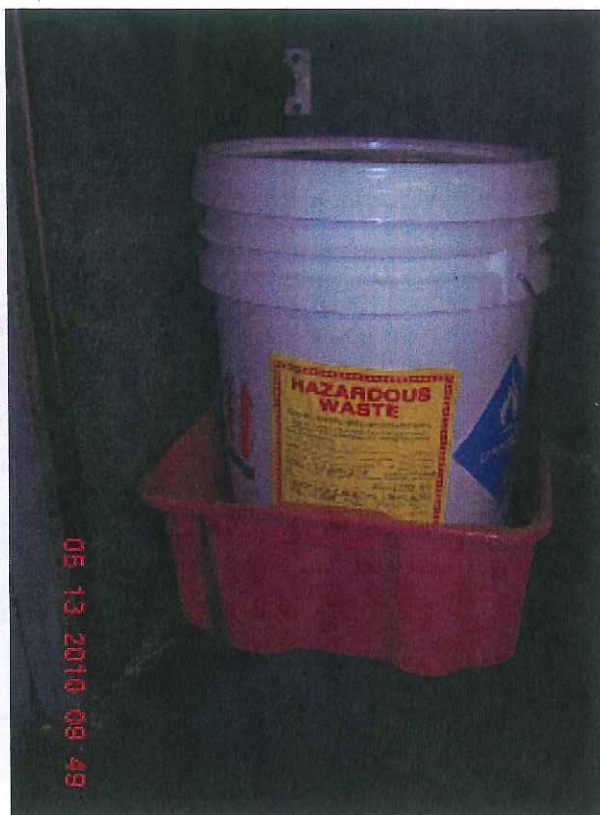
Photographs for University of Chicago

Media: RCRA

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Photo Filename DSCN0904.JPG
Date/Time 5/13/2010
9:50:00 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services.
Building - Water reactive waste in
northwest corner of Work Area.



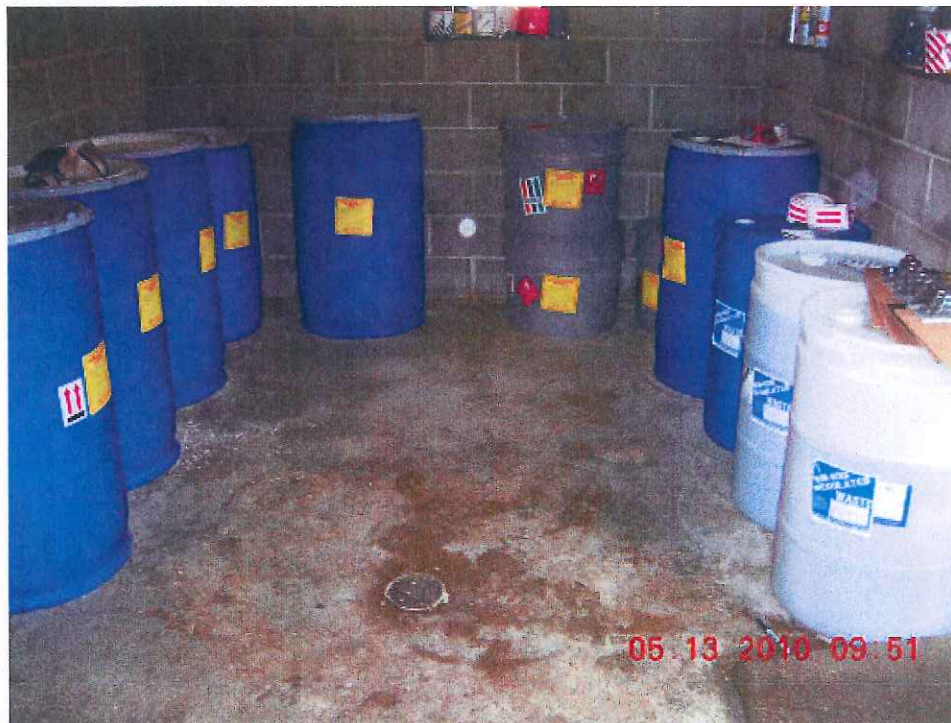
Photographs for University of Chicago

Media: RCRA

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Photo Filename DSCN0905.JPG
Date/Time 5/13/2010
9:51:26 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Waste Holding Room facing
south.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 21
Photo Filename DSCN0906.JPG
Date/Time 5/13/2010
9:51:36 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Waste Holding Room facing
north.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 22
Photo Filename DSCN0907.JPG
Date/Time 5/13/2010
9:56:04 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Eastern exterior of building with
door open to Waste Holding Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 23
Photo Filename DSCN0908.JPG
Date/Time 5/13/2010
9:56:24 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Eastern exterior of building with
door open to Waste Holding Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 24
Photo Filename DSCN0909.JPG
Date/Time 5/13/2010
9:57:24 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services Building - Western exterior of building with door to Work Area. Note address is 6041 and not 6049?



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 25
Photo Filename DSCN0910.JPG
Date/Time 5/13/2010
10:02:34 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Western exterior of building.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 26
Photo Filename DSCN0911.JPG
Date/Time 5/13/2010
10:02:44 AM
Photographer Diane Sharrow

Description

University of Chicago - Signage and gate to south of the Laboratory Services Building.



bcc: K. Chow, ORC (14J)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: The University of Chicago, Laboratory Service Building

U.S. EPA ID. No.: ILD 005 421 136

LOCATION ADDRESS: 6041 South Blackstone Avenue, Chicago, Illinois 60637

NAICS CODE: 61131 (Colleges, Universities and Professional Schools)
and 62211 (General Medical and Surgical Hospitals)

DATE OF INSPECTION: May 13, 2010

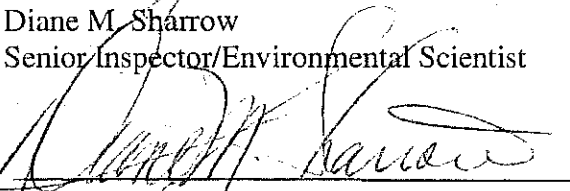
U.S. EPA INSPECTOR: Diane M. Sharrow

PREPARED BY:


Diane M. Sharrow
Senior Inspector/Environmental Scientist


Date

REVIEWED BY:


Lorna M. Jereza, Chief
Compliance Section I
RCRA Branch


Date

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Ms. Krista G. Cooley
Associate Director
Environmental Health and Safety Office
Risk Management, Audit and Safety Department
The University of Chicago
6054 South Drexel Ave Rm 214
Chicago, IL 60637

PS Form 3800, August 2006

See Reverse for Instructions

± LD 005421136

ILD005 5421 136
(Main File)

Illinois EPA Handler Generator Status Update Form

Record required RCRAInfo handler data fields for
facilities determined by an inspection to have a change
in generator status.

BOL ID # ILD005154778
10910 S. Langley Ave.
ILR000114512
5619 S. Cottage Grove
ILR000124008
5540 S. Hyde Park Ave.
ILR000124016
5445 Ingleside Ave.
ILR000124024
5454 S. Shore Dr.
ILR000129106
1027 E. 57th St.
ILR000146787
1369 E. Hyde Park Ave.
ILR000143750
Nursery School

General Correspondence

Date of Inspection: 8/24/9
10/5/9
Inspector Name: Diane Sharrow

EPA Identification Number: ILD005154778
10910 S. Langley Ave.
ILR000114512
5619 S. Cottage Grove
ILR000124008
5540 S. Hyde Park Ave.
ILR000124016
5445 Ingleside Ave.
ILR000124024
5454 S. Shore Dr.
ILR000129106
1027 E. 57th St.
ILR000146787
1369 E. Hyde Park Ave.
ILR000143750
Nursery School

Installation Name: University of Chicago & University of Chicago
Hospital

Location Street Address: See list above & attached PDF

Location City: Chicago Location State: Illinois

Location Zip Code: 60637

Location County: Cook

Current Generator Status: Not a generator (see attached PDF)

N – Not a Generator

1 – Large Quantity Generator

2 – Small Quantity Generator

Copies made for 8 other ID Nos &
placed in their files. DMS

3 – Conditionally Exempt SQG

Comments: The University of Chicago is using ID NO ILD005421136 on all manifests for all hazardous waste generated at the University and the University of Chicago Hospital. RCRA Info shows the address for ILD005421136 as 960 E. 58th St., Chicago, IL 60637. There is no bldg at this address – the less than 90 day storage facility is located at 6049 S. Blackstone Ave., Chicago, IL 60637.

The use of the ID NO ILD005421136 appears to be a carry over from the previous 90 day storage facility that was closed and demolished (?). Traditionally, ID Nos remain with a property location. However, the University of Chicago may have been told by the State of IL during closure activities, or the University of Chicago may have assumed that the continued use of this ID No for 6049 S. Blackstone Ave., was /is acceptable.

USEPA recommends that if the University of Chicago continues to use the ID NO ILD005421136 for 6049 S. Blackstone Ave., that the University of Chicago submit an Notification Form (EPA form 8700-12) to the State of IL – Illinois EPA to show the correct name (University of Chicago), correct mailing address of owner/operator and correct address of the less than 90 day storage facility.

E-mail form to Donna.Nicholson@illinois.gov

Note: Some generators may not be a Large Quantity Generator at the time of the inspection, but wish to retain the Large Quantity Generator status due to intermittent status as a Large Quantity Generator. If possible, the inspector should inform the handler of any intent to change their generator status.



RE: Violation Clarification on EPA I.D. No.: 005 421 136
Melissa Gilmore to: Diane Sharrow

07/28/2010 03:57 PM

From: Melissa Gilmore <mgilmore@uchicago.edu>
To: Diane Sharrow/R5/USEPA/US@EPA

Diana,

Attached is the notification form to correct the name and address of our Hazardous Waste Facility.

Thanks,
Melissa

Melissa Jackson | Industrial Hygienist | Risk Management, Audit and Safety |
Environmental Health and Safety

6054 S. Drexel Avenue - Room 219, Chicago, IL 60637 | : 773-834-7939 | :
773-702-6546 | : mgilmore@uchicago.edu
<http://safety.uchicago.edu>

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-----Original Message-----

From: Sharrow.Diane@epamail.epa.gov [mailto:Sharrow.Diane@epamail.epa.gov]
Sent: Friday, July 23, 2010 3:37 PM
To: Melissa Gilmore
Cc: Sharrow.Diane@epamail.epa.gov
Subject: RE: Violation Clarification on EPA I.D. No.: 005 421 136

Melissa,

I forgot to ask you this morning, but has University of Chicago filed an amended / subsequent notification (see attached) to correct the name and address of the facility from University of Chicago Hospital to the entire University of Chicago and change facility address to that of the storage facility and the mailing address to your office? If so, can you provide me with a copy of what was sent to the Illinois EPA and/or the date?

Thank you,

(See attached file: Notification Form 8700-12.pdf)

Diane M. Sharrow

Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Direct 312.886.6199
Facsimile 312.692.2906

Sharrow.Diane@epa.gov

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RE: Violation Clarification on EPA I.D. No.: 005 421 136

Diane Sharrow to: Donna.Nicholson

08/02/2010 07:02 AM

Cc: Melissa Gilmore, Kevin Chow, Spiros Bourgikos, Lorna Jereza

Bcc: Diane Sharrow

From: Diane Sharrow/R5/USEPA/US

To: Donna.Nicholson@illinois.gov

Cc: Melissa Gilmore <mgilmore@uchicago.edu>, Kevin Chow/R5/USEPA/US@EPA, Spiros Bourgikos/R5/USEPA/US@EPA, Lorna Jereza/R5/USEPA/US@EPA

Bcc: Diane Sharrow/R5/USEPA/US

Donna,

See below for an attached amended notification from the University of Chicago to be managed / processed by Illinois EPA .

Thank you,

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

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Melissa Gilmore

Diana, Attached is the notification form to correc...

07/28/2010 03:57:21 PM

From: Melissa Gilmore <mgilmore@uchicago.edu>

To: Diane Sharrow/R5/USEPA/US@EPA

Date: 07/28/2010 03:57 PM

Subject: RE: Violation Clarification on EPA I.D. No.: 005 421 136

Diana,

Attached is the notification form to correct the name and address of our Hazardous Waste Facility.

Thanks,
Melissa

Melissa Jackson | Industrial Hygienist | Risk Management, Audit and Safety |
Environmental Health and Safety

6054 S. Drexel Avenue - Room 219, Chicago, IL 60637 | : 773-834-7939 | :
773-702-6546 | : mgilmore@uchicago.edu

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Cc: Sharrow.Diane@epamail.epa.gov

Subject: RE: Violation Clarification on EPA I.D. No.: 005 421 136

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Thank you,

(See attached file: Notification Form.8700-12.pdf)

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Direct 312.886.6199
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Sharrow.Diane@epa.gov

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RCRA Site ID Form 7.7.2010.pdf



RE: Violation Clarification on EPA I.D. No.: 005 421 136 

Diane Sharrow to: Melissa Gilmore

Cc: Diane Sharrow

07/23/2010 03:36 PM

Melissa,

I forgot to ask you this morning, but has University of Chicago filed an amended / subsequent notification (see attached) to correct the name and address of the facility from University of Chicago Hospital to the entire University of Chicago and change facility address to that of the storage facility and the mailing address to your office? If so, can you provide me with a copy of what was sent to the Illinois EPA and/or the date?

Thank you,



Notification Form 8700-12.pdf

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
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RE: Violation Clarification on EPA I.D. No.: 005 421 136

Melissa Gilmore

to:

Diane Sharrow

07/14/2010 12:28 AM

Show Details

UofC

Ms. Sharrow,

An extension until July 30, 2010 will work for the University of Chicago.

Thanks,

Melissa

Melissa Jackson | Industrial Hygienist | Risk Management, Audit and Safety | Environmental Health and Safety



6054 S. Drexel Avenue - Room 219, Chicago, IL 60637 | ☎: 773-834-7939 | 📠: 773-702-6546 | ✉: mgilmore@uchicago.edu

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From: Sharrow.Diane@epamail.epa.gov [mailto:Sharrow.Diane@epamail.epa.gov]

Sent: Tuesday, July 13, 2010 7:38 AM

To: Melissa Gilmore

Subject: RE: Violation Clarification on EPA I.D. No.: 005 421 136

Ms. Gilmore -

I can approve an extension until July 30th, 2010. Will that work for The University of Chicago?

Tanks you,

Diane M. Sharrow

Environmental Scientist/Senior Inspector

USEPA, Region 5, Land and Chemicals Division

RCRA Branch, Compliance Section 1

Mail Code LR-8J

77 W. Jackson Blvd.

Chicago, IL 60604-3590

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-----Melissa Gilmore <mgilmore@uchicago.edu> wrote: -----

To: Diane Sharrow/R5/USEPA/US@EPA
From: Melissa Gilmore <mgilmore@uchicago.edu>
Date: 07/12/2010 04:00PM
Subject: RE: Violation Clarification on EPA I.D. No.: 005 421 136

Ms. Sharrow,

We do need an extension, how do I go about requesting one.

Thanks,
Melissa

Melissa Jackson | Industrial Hygienist | Risk Management, Audit and Safety | Environmental Health and Safety



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From: Sharrow.Diane@epamail.epa.gov [mailto:Sharrow.Diane@epamail.epa.gov]
Sent: Saturday, July 10, 2010 4:13 PM
To: Melissa Gilmore
Subject: Re: Violation Clarification on EPA I.D. No.: 005 421 136

Ms. Gilmore:

I need the job description for each employee from Wilpen that works for UofC managing haz waste. If the same job description applies to all- then it is sufficient. I need the names of all Wilpen employees that work at UofC - if this changes - UofC s/be keeping track and making sure the Wipen employees are trained.

Unless the employee who is entering documents into a database also has haz waste job responsibilities that entail responding to emergencies, and/or are specifically listed in the

Contingency Plan or have haz waste management responsibilities - deciding when a waste is a waste, what waste code applies, signing a manifest, inspecting the storhare facility, etc., then no.

If you need an extension of time - please let me know and we can give UofC more time.

Thx

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

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-----Melissa Gilmore <mgilmore@uchicago.edu> wrote: -----

To: Diane Sharrow/R5/USEPA/US@EPA
From: Melissa Gilmore <mgilmore@uchicago.edu>
Date: 07/09/2010 10:33AM
Subject: Violation Clarification on EPA I.D. No.: 005 421 136

Ms. Sharrow,

I need clarification on one of the violations we received on June 17, 2010 (EPA I.D. No.: 005 421 136) which states that:

“A large quantity generator of hazardous waste must also maintain the job title for each position at the facility related to hazardous waste management, the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and former employees. See 35 IAC § 722.134(a) (4) and 725.116 (a)-(e) [40 CFR § 262.34 (a)(4) and 265.16 (a)(1)-(3), (b), (c), (d)(1)-(4) and (e)]. At the time of the inspection, The University of Chicago had not ensured that the job title for each position at the facility (specifically, for the contract employees from Wilpen Environmental Services, Incorporated), related to hazardous waste management, including the name of the employee filling each job, as well as a written job

description, a written description of the training, and training records on current and former employees were maintained.”

Does this violation require The University of Chicago to provide a job description for each individual who works in our hazardous waste storage facility from Wilpen Environmental Services or would the job description Wilpen provide us be sufficient (see attachment). Also, do you need job descriptions with each employee from our Safety Office who inspects the hazardous waste storage facility and enter any hazardous waste document into our database.

A quick response will be highly appreciated due to the fact that we are approaching the deadline of July 16th.

Thanks,
Melissa

Melissa Jackson | Industrial Hygienist | Risk Management, Audit and Safety | Environmental Health and Safety



6054 S. Drexel Avenue – Room 219, Chicago, IL 60637 | ☎: 773-834-7939 | 📠: 773-702-6546 | ✉: mgilmore@uchicago.edu

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RE: Violation Clarification on EPA I.D. No.: 005 421 136
Melissa Gilmore
to:
Diane Sharrow
07/12/2010 04:00 PM
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History: This message has been replied to.
Ms. Sharrow,

We do need an extension, how do I go about requesting one.

Thanks,
Melissa

Melissa Jackson | Industrial Hygienist | Risk Management, Audit and Safety | Environmental Health and Safety



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Thx
Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division

RCRA Branch, Compliance Section 1
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A quick response will be highly appreciated due to the fact that we are approaching the deadline of July

16th.

Thanks,
Melissa

Melissa Jackson | Industrial Hygienist | Risk Management, Audit and Safety | Environmental Health and Safety



6054 S. Drexel Avenue – Room 219, Chicago, IL 60637 | ☎: 773-834-7939 | 📠: 773-702-6546 | ✉: mgilmore@uchicago.edu

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Violation Clarification on EPA I.D. No.: 005 421 136
 Melissa Gilmore
 to:
 Diane Sharrow
 07/09/2010 10:33 AM
 Show Details

History: This message has been replied to.
 Ms. Sharrow,

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RE: Violation Clarification on EPA I.D. No.: 005 421 136

Diane Sharrow to: Melissa Gilmore

07/13/2010 07:37 AM

From: Diane Sharrow/R5/USEPA/US
To: Melissa Gilmore <mgilmore@uchicago.edu>

Ms. Gilmore -

I can approve an extension until July 30th, 2010. Will that work for The University of Chicago?

Tanks you,
Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Direct 312.886.6199
Facsimile 312.692.2906

Sharrow.Diane@epa.gov

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-----Melissa Gilmore <mgilmore@uchicago.edu> wrote: -----

To: Diane Sharrow/R5/USEPA/US@EPA
From: Melissa Gilmore <mgilmore@uchicago.edu>
Date: 07/12/2010 04:00PM
Subject: RE: Violation Clarification on EPA I.D. No.: 005 421 136

Ms. Sharrow,

We do need an extension, how do I go about requesting one.

Thanks,

Melissa

Melissa Jackson | Industrial Hygienist | Risk Management, Audit and Safety | Environmental Health and Safety



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From: Sharrow.Diane@epamail.epa.gov [mailto:Sharrow.Diane@epamail.epa.gov]
Sent: Saturday, July 10, 2010 4:13 PM
To: Melissa Gilmore
Subject: Re: Violation Clarification on EPA I.D. No.: 005 421 136

Ms. Gilmore:

I need the job description for each employee from Wilpen that works for UofC managing haz waste. If the same job description applies to all - then it is sufficient. I need the names of all Wilpen employees that work at UofC - if this changes - UofC s/be keeping track and making sure the Wipen employees are trained.

Unless the employee who is entering documents into a database also has haz waste job responsibilities that entail responding to emergencies, and/or are specifically listed in the Contingency Plan or have haz waste management responsibilities - deciding when a waste is a waste, what waste code applies, signing a manifest, inspecting the storhare facility, etc., then no.

If you need an extension of time - please let me know and we can give UofC more time.

Thx

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Direct 312.886.6199
Facsimile 312.692.2906

Sharrow.Diane@epa.gov

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Diane Sharrow to: Melissa Gilmore

07/10/2010 04:12 PM

From: Diane Sharrow/R5/USEPA/US
To: Melissa Gilmore <mgilmore@uchicago.edu>

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUN 15 2010

LR-8J

CERTIFIED MAIL 7009 1680 0000 7665 1622
RETURN RECEIPT REQUESTED

Ms. Krista G. Cooley
Associate Director
Environmental Health and Safety Office
Risk Management, Audit and Safety Department
The University of Chicago
6054 South Drexel Avenue, Room 214
Chicago, Illinois 60637

Re: Notice of Violation
The University of Chicago
EPA I.D. No.: ILD 005 421 136
6041 South Blackstone Avenue

Dear Ms. Cooley:

On May 13, 2010, a representative of the U.S. Environmental Protection Agency inspected The University of Chicago Laboratory Service Building facility located at 6041 South Blackstone Avenue in Chicago, Illinois. The purpose of the inspection was to evaluate The University of Chicago's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on EPA's May 13, 2010, inspection that included personal observations made by the inspector, and a subsequent review of records and information provided by The University of Chicago personnel and contractors, EPA finds that The University of Chicago is engaged in the management of hazardous waste without a hazardous waste permit, and is in violation of the requirements of Illinois Administrative Code (IAC) and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste treatment, storage or disposal permit, The University of Chicago must be in compliance with the conditions of 35 IAC § 722.134(a) and (c) [40 CFR § 262.34(a) and (c)].

Specifically, we find that The University of Chicago is in noncompliance with the following conditions for a hazardous waste storage permit exemption, and in violation of the following requirements:

1. A generator of greater than 1,000 kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the hazardous waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and must submit an Exception Report if the generator has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. See 35 IAC §§ 722.142(a)(1) and (a)(2) [40 CFR § 262.42(a)(1) and (a)(2)]. At the time of EPA's May 13, 2100, inspection, The University of Chicago could not locate copies of all manifests with the handwritten signature of the owner or operator of the designated facility from November 1, 2009 to April 9, 2010, and for such manifests failed to document contact with the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and submittals of any Exception Reports when it did not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

2. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must ensure that facility personnel complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with applicable hazardous waste storage facility performance standards and that they review such training annually. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (*including contingency plan implementation*) relevant to the positions in which they are employed. See 35 IAC § 722.134 (a) (4) and 725.116 (a)-(e) [40 CFR § 262.34 (a)(4) and 265.16 (a)(1)-(3), (b), (c), (d)(1)-(4) and (e)]. At the time of the inspection, The University of Chicago had not ensured that facility contract personnel, including contract staff from Wilpen Environmental Services, Incorporated, had completed a program of classroom instruction or on-the-job training that taught them to perform their duties in a way that ensures the facility's compliance with applicable hazardous waste storage facility performance standards, that they had reviewed such training annually, that the program was directed by a person trained in hazardous waste management procedures, and that the instruction had taught facility personnel hazardous waste management procedures (*including contingency plan implementation,*) relevant to the positions in which they are employed.

3. A large quantity generator of hazardous waste must also maintain the job title for each position at the facility related to hazardous waste management, the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and former employees. See 35 IAC § 722.134(a) (4) and 725.116 (a)-(e)

[40 CFR § 262.34 (a)(4) and 265.16 (a)(1)-(3), (b), (c), (d)(1)-(4) and (e)]. At the time of the inspection, The University of Chicago had not ensured that the job title for each position at the facility (specifically, for the contract employees from Wilpen Environmental Services, Incorporated), related to hazardous waste management, including the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and former employees were maintained.

4. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must maintain a copy of the contingency plan at the facility. See 35 IAC §§ 722.134 (a) (4) and 725.153 (a) [40 CFR § 262.34 (a) (4) and 265.53 (a)]. At the time of the inspection, a copy of The University of Chicago's Laboratory Service Building October 23, 2009 Contingency Plan was not maintained at 6041 South Blackstone Avenue, Chicago, Illinois 60637.

5. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must review and revise the facility contingency plan when the facility changes in a way that modifies the emergency response necessary, when information regarding the emergency coordinators changes, or when equipment changes. See 35 IAC § 722.134 (a) (4) and 725.154 (c), (d) and (e) [40 CFR § 262.34 (a) (4) and 265.54 (c), (d) and (e)]. At the time of the inspection, The University of Chicago's Laboratory Service Building October 23, 2009 Contingency Plan, had not been updated to reflect changes in the address (which should have been correctly and consistently identified 6041 rather than 6049 South Blackstone Avenue), the capability of the emergency equipment (contents of the spill kit), and the location of emergency equipment (spill kit should have been located inside rather than outside the facility).

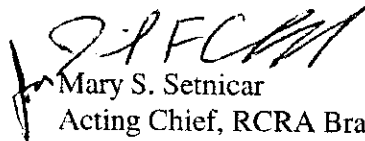
6. A large quantity generator of hazardous waste which accumulates hazardous waste on-site for 90 days or less, and which does not meet the conditions for a hazardous waste permit exemption of 35 IAC § 722.134 (a) [40 CFR § 262.34 (a)], is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See 35 IAC § 703.121(a) and (b), 703.180 (c) and 705.121 (a) [40 CFR § 270.1 (c), 270.10 (a) and (d)]. By virtue of its failure to comply with the exception reporting, training, and contingency plan requirements for a hazardous waste permit exemption, The University of Chicago became the owner or operator of a hazardous waste treatment, storage or disposal facility. The University of Chicago failed to apply for and obtain a hazardous waste storage permit, and The University of Chicago's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC § 703.121 (a) and (b), 703.180 (c) and 705.121 (a) [40 CFR § 270.1 (c), 270.10 (a) and (d)].

At this time, EPA is not requiring The University of Chicago to apply for a hazardous waste treatment, storage or disposal permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the RCRA, EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response to each of the violations noted above in writing to

this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements. However, please be advised that The University of Chicago's compliance with the conditions and requirements described above will not relieve The University of Chicago of its liability for the violations identified in this letter. EPA reserves the right to bring further enforcement actions (including an action for civil penalties) against The University of Chicago for the violations identified in this letter.

You should submit your response to Diane Sharrow, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Sharrow, of my staff, at (312) 886-6199.

Sincerely,


Mary S. Setnicar
Acting Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency

bcc: K. Chow, ORC (14J)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: The University of Chicago, Laboratory Service Building

U.S. EPA ID. No.: ILD 005 421 136

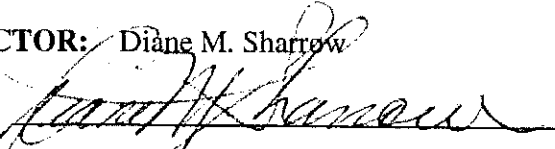
LOCATION ADDRESS: 6041 South Blackstone Avenue, Chicago, Illinois 60637

NAICS CODE: 61131 (Colleges, Universities and Professional Schools)
and 62211 (General Medical and Surgical Hospitals)

DATE OF INSPECTION: May 13, 2010

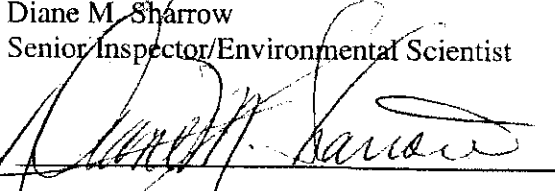
U.S. EPA INSPECTOR: Diane M. Sharrow

PREPARED BY:


Diane M. Sharrow
Senior Inspector/Environmental Scientist


Date

REVIEWED BY:


Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch


Date

Purpose of Inspection

The purpose of the inspection was to conduct a compliance evaluation inspection (CEI) at The University of Chicago and specifically, the Laboratory Service Building (LSB). The LSB is located at 6041 South Blackstone Avenue, Chicago, Illinois 60637.

Background

A CEI to evaluate compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically those regulations related to the management of hazardous waste, was last conducted by Todd Brown of the United States Environmental Protection Agency (U.S. EPA) at The University of Chicago, and the LSB under U.S. EPA Identification Number (EPA ID No.) ILD005421136, on August 26, 2004. An attempt to conduct a CEI at ILD005421136 located at 960 East 58th Street (the location address specified in RCRA Info) was attempted on August 24, 2009, by Diane Sharrow of the U.S. EPA, but the LSB was not located at this address and the address could not be located. Ms. Sharrow also could not locate the owner or operator at the mailing address of 5555 South Ellis Avenue as was indicated in RCRA Info. A Request for Information was made by U.S. EPA to The University of Chicago on October 5, 2009, to determine the operation status of ILD005421136, as well as the following eight EPA ID Nos.: ILD005154778, ILR000114512, ILR000124008, ILR000124016, ILR000124024, ILR000129106, ILR000146787, and ILR000143750. The University of Chicago indicated in its November 5, 2009, response to the Request for Information that all EPA ID Nos., except for ILD005421136 were no longer active.

The University of Chicago (identifying itself as The University of Chicago Hospital) first notified U.S. EPA of its hazardous waste activities on or about August 18, 1980, and was issued EPA ID No. ILD005421136. The University of Chicago subsequently filed both the Part A and Part B portions of a RCRA hazardous waste permit application, and was issued a final permit by U.S. EPA on July 15, 1991, with an effective date of August 19, 1991. A Closure Plan and Final Closure were approved by the Illinois Environmental Protection Agency (Illinois EPA) on June 30, 2005, with clean closure verification on July 18, 2006. The University of Chicago also appears to have been assessed for purposes of corrective action, and solid waste management units (SWMUs) and areas of concern (AOCs) were identified. A copy of the corrective action RCRA Facility Assessment (RFA) is located in U.S. EPA's files.

Facility Description

The University of Chicago is located near Lake Michigan on the near southside of Chicago. The University of Chicago is a private teaching and research institution that includes a Medical Center or Hospital. The LSB is located on the south-east end of campus at 6041 South Blackstone Avenue (Photographs I-28). The LSB is a stand-alone building with eight rooms, including a wash room, hall, work area, waste holding room, and separate storage rooms for oxidizers, toxics, acids and flammables.

Hazardous waste is not accepted at the LSB from off-site. Hazardous waste is generated on campus from a variety of sources, but primarily from laboratory, research and medical activities. Hazardous wastes are generated by greater than 1,000 locations, many on an infrequent basis. A university generator calls the Environmental Health and Safety Office and requests a pickup. Requests are tracked in a database, and the waste is picked up by the university contractor, Wilpen Environmental Services, Incorporated (Wilpen), and taken to the LSB. Wilpen manages the container storage at the LSB, and generates and prepares all manifests and Land Disposal Restriction (LDR) forms for The University of Chicago, prior to transport off-site to a licensed treatment, storage and disposal facility (TSDF). Wilpen does not analyze wastes, unless it is an unknown. It is analyzed or identified by the generator prior to pickup.

Opening Conference

I arrived at the 6000 block of South Blackstone Avenue at approximately 9:30 AM. I could not locate the LSB at 6049 as noted on the figure attached to the October 23, 2009, Contingency Plan submitted by The University of Chicago on November 5, 2009 in response to U.S. EPA's Request for Information. I noted several other addresses including 6041 (Photograph 25). I walked north of 6041 and then walked south to the end of the cul-de-sac on Blackstone Avenue. I then entered an open door at the building south of 6041 posted "No Admittance" and presented my enforcement credentials to a man working in the area (Photograph 26). I asked him if he could tell me where the LSB was located. He indicated it was located at 6041 and walked me to an open door on the east side of 6041.

I noted two men working at 6041 and presented my enforcement credentials to them. I explained that I wished to conduct an unannounced hazardous waste inspection that included a visual site inspection (VSI) and a records review. One of the men introduced himself as Joe Sapienza of Wilpen. He indicated that he worked for Wilpen and that every Thursday, Wilpen picks up and brings hazardous waste to the LSB, and that approximately every three weeks a transporter arrives to pickup the hazardous waste and deliver the hazardous waste to Environmental Enterprises in Cincinnati, Ohio. Mr. Sapienza also offered to accompany me on a VSI. I told him that I wished to contact The University of Chicago staff prior to beginning the VSI.

Mr. Sapienza led me into the LSB and pointed out a list of telephone numbers taped to the wall of the Work Area (Photographs 16, 17, 18 and 27). He pointed out the general number for Environmental Health and Safety (EHS). I called EHS on my cellular telephone and explained that I wished to conduct an unannounced hazardous waste inspection that included a VSI and a records review, but wished to have a representative of The University of Chicago accompany me. She placed me on hold, and a few minutes later she indicated that a representative would be there in about ten minutes. I relayed this information to Mr. Sapienza, and he again offered to show me around the LSB.

Visual Site Inspection

About ten minutes later, Sarah Grover of The University of Chicago arrived. I presented my enforcement credentials to Ms. Grover and I explained that I wished to conduct an unannounced hazardous waste inspection that included a VSI and a records review. She agreed to escort me on the VSI. I started the VSI in the Hall of the LSB (Photograph 1) at the Oxidizers Waste Storage Room (Photographs 2 and 3), proceeded to the Toxics Waste Storage Room (Photographs 4-6), and then proceeded to the Acids Waste Storage Room aka Corrosives (photographs 7-9). I then entered the Flammable Waste Storage Room (Photographs 10-12). I noted that the fire extinguishers in the Flammable Waste Storage Room had recently been checked (Photograph 13). I then moved into the Hall and to the Work Area. I asked Ms. Grover and Mr. Sapienza about why containers of the flammable hazardous waste were in the Hall (Photographs 1, 14 and 28). They indicated that the amount of hazardous waste required use of the Hall and Work Area for storage. I entered the Work Area (Photographs 15-19), and Mr. Sapienza pointed out a container of water reactive waste (Photograph 19).

I asked about the emergency information I observed posted on the wall of the Work Area with grey duct tape. Mr. Sapienza and Ms. Grover indicated that this information (Photographs 1, 17-18 and 27) had been prepared and posted by Wilpen. I asked to photograph the information and I also noted that the information did not match the information in the October 23, 2009, Contingency Plan previously submitted by The University of Chicago. I then returned to the Waste Holding Room where Wilpen was finishing up the lab packing of hazardous waste containers (Photographs 20 -21). We then walked outside where Mr. Sapienza pointed out that the containers on the east and north side of the LSB were empty (Photographs 22 and 23). During the VSI, I did not note any labeling violations or storage greater than 90 days. I did note that there was yellow spill-response kit outside.

Ms. Grover then agreed to lead me in her vehicle to the Environmental Health and Safety Office located at 6054 South Drexel Avenue, where I could conduct the Records Review portion of the CEI. On the way to my vehicle I took Photographs 25 and 26.

Records Review

Ms. Grover met me in the lobby of 6054 South Drexel. We took the elevator to the Environmental Health and Safety Office and convened in a conference room. We were joined by Melissa Jackson of The University of Chicago. I presented my enforcement credentials to Ms. Jackson. At this time I also gave Ms. Grover the following documents: the U.S. EPA OECA Small Business Information Sheet, the U.S. EPA Region 5 List of Pollution Prevention Contacts, and the Illinois Sustainable Technology Center Brochure. Midway through the Records Review we were joined by Krista Cooley, who stayed for a portion of the Record Review, left and then returned for the Closing Conference. I presented my enforcement credentials to Ms. Cooley.

During the Record Review I focused on records created since the Request for Information. I reviewed hazardous waste manifests as well as accompanying LDR certifications; annual reports; personnel training program records; contingency plan and inspection records.

Ms. Grover and Ms. Jackson explained that The University of Chicago trains all staff on its Chemical Hygiene Plan once when hired, and again if unsafe practices are found. They also indicated that there were a total of ten staff in their immediate office: Steve Beaudoin, Krista Cooley, Hugo Rodriguez, Christopher Harvey, Paula Dillon, Kevin Rohrer, Tom Hosack, and Jill Singleton, the receptionist, in addition to Ms. Jackson and Ms. Grover. They also provided me with a copy of job descriptions and Mr. Beaudoin's and Ms. Cooley's certificates of annual hazardous waste management training (March 11, 2010), but were unable to provide documentation that Wilpen or other staff had been trained on implementation of The University of Chicago's Contingency Plan.

I noted in my review of manifests that the copies signed by the TSD were not available. Ms. Jackson indicated that they probably had been received, but had not yet been matched to the generator copies. I also noted, and Ms. Jackson and Ms. Grover confirmed that The University of Chicago uses Midwest Environmental Transporters and that only Ms. Cooley and Mr. Beaudoin sign the manifests and submit the Annual Reports.

I also asked if staff or Wilpen inspect the LSB building on a weekly basis. Ms. Jackson and Ms. Cooley indicated that the four industrial hygienists take turns conducting the weekly inspections and I reviewed eight weeks of documentation. I also asked if the storage of hazardous waste in the Hall and Work Area at the LSB was common, as I was concerned about aisle space. They indicated it was not, but depended on generation and laboratory cleanouts, etc.

I asked Ms. Cooley and Ms. Jackson about whether there was a copy of the Contingency Plan at the LSB. They indicated that they thought there was and that it was in the Fire Department Information Center Box located outside the 6041 entrance door (Photograph 24). We agreed that at the close of the Records Review, Ms. Cooley and I would return to the LSB and verify whether the Contingency Plan was at the LSB in the Fire Department Information Center. Ms. Cooley indicated that copies of the Contingency Plan had been sent to the local emergency authorities.

Closing Conference

Ms. Cooley rejoined us as part of the Closing Conference. I indicated that I would send a letter to The University of Chicago, along with the inspection report, checklist and photographs in the next few weeks. I asked if I should send the documents to Ms. Cooley, and she said yes. I also asked Ms. Cooley if The University of Chicago could schedule more frequent shipments of hazardous waste, or whether it was a cost determination, because I was concerned about aisle space, access to emergency response equipment and that the Spill Kits should be stored on the inside of the LSB. She indicated that cost was not a factor and that shipments could be scheduled more frequently to ensure aisle space of at least three feet was maintained. I also indicated that the address of the LSB on the diagram attached to Contingency Plan was incorrect (6049). I concluded the CEI at approximately 12:45 PM and departed with Ms. Grover to return to the LSB.

Contingency Plan at the LSB

When Ms. Grover and I returned to the LSB, we found that there was not a copy of the Contingency Plan in the Fire Department Information Center Box (Photograph 24). Ms. Grover placed a copy in the Box. We then entered the LSB and placed a copy of the Contingency Plan in the Work Area where Wilpen was still working. Mr. Sapienza indicated that he had prepared the emergency information posted by Wilpen, and could revise it to reflect the Contingency Plan. Ms. Grover then asked about the placement of the Spill Kit outside the LSB and Mr. Sapienza indicated it would be returned to the interior of the LSB. I then departed the LSB at approximately 1:30 PM.

ATTACHMENT(S):

Inspection Checklist
Photographs (28)



NOV IRC - The University of Chicago
Margaret Gray to: Diane Sharrow

06/16/2010 07:51 AM

From: Margaret Gray/R5/USEPA/US
To: Diane Sharrow/R5/USEPA/US@EPA

Attach is a pdf copy of a NOV IRC to The University of Chicago.

Margaret Gray, Administrative Program Assistant
Land and Chemicals Division
RCRA Branch
(312) 353-5028

----- Forwarded by Margaret Gray/R5/USEPA/US on 06/16/2010 07:53 AM -----

From: R5IMB_08-20@epa.gov
To: Margaret Gray/R5/USEPA/US@EPA
Date: 06/15/2010 03:25 PM
Subject: Scan from a Xerox WorkCentre Pro

Please open the attached document. It was scanned and sent to you using a Xerox WorkCentre Pro.

Sent by: Guest [R5IMB_08-20@epa.gov]
Number of Images: 54
Attachment File Type: PDF

WorkCentre Pro Location: 08-20
Device Name: R5LCD-08-20-275



Scan001.PDF



Enforcement Action Communication - The University of Chicago

Diane Sharrow to: Dennis.McMurray, Todd.Marvel,
William.Ingersoll, Paul.Purseglove

06/07/2010 06:55 AM

Cc: Lorna Jereza, Spiros Bourgikos, Diane Sharrow
Bcc: Michael Valentino

From: Diane Sharrow/R5/USEPA/US
To: Dennis.McMurray@illinois.gov, Todd.Marvel@illinois.gov, William.Ingersoll@illinois.gov,
Paul.Purseglove@illinois.gov
Cc: Lorna Jereza/R5/USEPA/US@EPA, Spiros Bourgikos/R5/USEPA/US@EPA, Diane
Sharrow/R5/USEPA/US@EPA
Bcc: Michael Valentino/R5/USEPA/US@EPA

This is to inform you that on June 9, 2010, U.S. EPA will send by certified mail, the attached Notice of Violation (NOV) to The University of Chicago, located in Chicago, IL. The alleged violations were found during U.S. EPA's May 13, 2010, inspection of The University of Chicago.

Contact: Diane Sharrow (312) 886-6199



UofC.IL.Report.4June2010.doc UofC.IL.NOV.4June10.doc

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Direct 312.886.6199
Facsimile 312.692.2906

Sharrow.Diane@epa.gov

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William.Ingersoll, Paul.Purseglove

06/07/2010 06:55 AM

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Bcc: Michael Valentino

From: Diane Sharrow/R5/USEPA/US
To: Dennis.McMurray@illinois.gov, Todd.Marvel@illinois.gov, William.Ingersoll@illinois.gov,
Paul.Purseglove@illinois.gov
Cc: Lorna Jereza/R5/USEPA/US@EPA, Spiros Bourgikos/R5/USEPA/US@EPA, Diane
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Bcc: Michael Valentino/R5/USEPA/US@EPA

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Contact: Diane Sharrow (312) 886-6199



UofC.IL.Report.4June2010.doc UofC.IL.NOV.4June10.doc

Diane M. Sharrow
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Re: Fw: Incorrect addresses at University of Chicago

Diane Sharrow to: Diane Sharrow

Cc: Donna.Nicholson

06/04/2010 07:04 AM

From: Diane Sharrow/R5/USEPA/US
To: Diane Sharrow/R5/USEPA/US@EPA
Cc: Donna.Nicholson@illinois.gov

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
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Diane Sharrow

FYI - see below Diane M. Sharrow Environment...

06/04/2010 06:40:50 AM

From: Diane Sharrow/R5/USEPA/US
To: Donna.Nicholson@illinois.gov
Cc: Diane Sharrow/R5/USEPA/US@EPA
Date: 06/04/2010 06:40 AM
Subject: Fw: Incorrect addresses at University of Chicago

FYI - see below

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
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----- Forwarded by Diane Sharrow/R5/USEPA/US on 06/04/2010 06:39 AM -----

From: Krista Cooley <kcooley@uchicago.edu>
To: Diane Sharrow/R5/USEPA/US@EPA
Cc: Lorna Jereza/R5/USEPA/US@EPA, Kevin Chow/R5/USEPA/US@EPA
Date: 05/25/2010 08:18 AM
Subject: RE: Incorrect addresses at University of Chicago

Thanks for following up and providing us the form, Ms. Sharrow. We will process this form immediately.

Sincerely,
Krista

-----Original Message-----

From: Sharrow.Diane@epamail.epa.gov [mailto:Sharrow.Diane@epamail.epa.gov]
Sent: Monday, May 24, 2010 4:45 PM
To: Krista Cooley
Cc: Sharrow.Diane@epamail.epa.gov; Jereza.Lorna@epamail.epa.gov;
Chow.Kevin@epamail.epa.gov
Subject: Incorrect addresses at University of Chicago

Ms. Cooley,

As I discussed with Ms. Jackson, Ms. Grover and you on May 13, 2010, attached is a copy of the Notification Form the University should complete to change the name and addresses associated with the Lab Services Bldg. from Univ of Chicago Hospital to Univ of Chicago, the facility address from 960 E. 58th St., to 6041 S. Blackstone, and the mailing address from 5555 S. Ellis to 6054 S. Drexel. If you have any questions, please contact me.

Thank you,

(See attached file: Notification Form 8700-12.pdf)

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Direct 312.886.6199
Facsimile 312.692.2906

Sharrow.Diane@epa.gov

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To: Donna.Nicholason@illinois.gov
Cc: Diane Sharrow/R5/USEPA/US@EPA

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Sent: Monday, May 24, 2010 4:45 PM
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Cc: Sharrow.Diane@epamail.epa.gov; Jereza.Lorna@epamail.epa.gov;
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Thank you,

(See attached file: Notification Form 8700-12.pdf)

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University of Chicago ILD 005 421 136

Diane Sharrow to: todd.marvel, davidson.michael

Cc: Spiros Bourgikos, Lorna Jereza, Jane Ratcliffe, Kevin Chow

Bcc: Diane Sharrow

05/24/2010 09:42 AM

From: Diane Sharrow/R5/USEPA/US
To: todd.marvel@illinois.gov, davidson.michael@illinois.gov
Cc: Spiros Bourgikos/R5/USEPA/US@EPA, Lorna Jereza/R5/USEPA/US@EPA, Jane Ratcliffe/R5/USEPA/US@EPA, Kevin Chow/R5/USEPA/US@EPA
Bcc: Diane Sharrow/R5/USEPA/US

Todd and Mike,

I recently inspected The University of Chicago ILD 005 421 136.

The facility originally notified in 1980 as The University of Chicago Hospital, filed a Part A, received a permit, and underwent closure..

Since that time, the ID No has "migrated" / now is associated solely with the with the Laboratory Service Building located at 6041 S. Blackstone, Chicago, IL 60637 (sometimes erroneously indicated / referred to as 6049 South Blackstone).

The Laboratory Service Building stores all hazardous waste generated at the University and the Hospital / Medical Center.

The problem or issue is that RCRA Info is showing the ILD 005 421 136 facility location and owner address as 960 E. 58th Street, Chicago, IL 60637.

In addition the facility mailing address in RCRA Info is 5555 S. Ellis when it should be 6054 S. Drexel, Chicago, IL 60637.

I was hoping that the University would correct this by re-notifying / filing an amended notification form, but they have not done so.

Is there a method to correct RCRA Info / State database w/o a Notification Form and clear up the continuing confusion regarding this ID No.?

Could you also send me an electronic copy of a Notification Form that I can send to the University along with the NOV and inspection report I am preparing?

Thank you,

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Direct 312.886.6199
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Advanced Searches



Select the options with which to search:

All searches are based on an **and** condition. [Hint](#)

Basic	Wildcard	Owner / Operator
Handler ID: ILD005421136	Handler Name:	
Location Street Number:	Location Street Name:	
Location City:	Location State: Select State	Location Zip:
Location County:	State District:	
<input type="checkbox"/> Check this box to search on active sites only.	<input type="checkbox"/> Click this box to also Search Other IDs.	

[Search](#) [Reset Form](#) [Back to Main Menu](#)

Page: 1

There are 1 records, displaying 1 - 1. Select the handler to process.

	Act Loc	▲ Handler ID ▼	▲ Handler Name ▼	▲ Address ▼	▲ City ▼	▲ State ▼	▲ County ▼	Active Status	In a Universe	Controls in Place
1	IL	ILD005421136	UNIVERSITY OF CHICAGO HOSPITAL	960 E 58TH ST	CHICAGO	IL	COOK	H---	Y	N

Page: 1

[Back to the Main Menu](#)

URL: /rcrainfo/searches/search.jsp



Handler Details



UNIVERSITY OF CHICAGO HOSPITAL

CHICAGO

ILD005421136

Universes for Illinois

View Universes for IL

Handler Universes

Active Status	Controls in Place	In a Universe	Gen. Status	Transporter	Univ. Waste	Recycler	Used Oil	Furnace Exempt	Importer	Onsite Burner Exempt	Mixed Waste Gen.	Underground Injection
H----	N	Y	LQG	N	Y	N	NNNNNNN	N	N	N	Y	N

Permitting and Corrective Action Universes

Permit Workload	Closure Workload	Post-Closure Workload	Permit Progress	CA Workload	Subject to CA	Subject to CA - TSD	Subject to CA - Discretion	Subject to CA - Non-TSD
----	----	----	---S-	N	Y	N	Y	N

Compliance, Monitoring and Enforcement and GPRA Universes

Full Enforcement	Operating TSDF	SNC	BOYSNC	Permit GPRA	Renewals GPRA	CA GPRA
----	----	N	N	+	N	Y

Source Summary Table

** indicates this source record was used for the Universe Calculations.

Act. Loc.	▲ Source ▼	Sequence	▲ Receipt date ▼	▲ Certification date ▼	Non-notifier
IL	** R	10	03/01/2008	03/01/2008	
IL	R	9	03/01/2006	03/01/2006	
IL	R	8	03/01/2004	03/01/2004	
IL	R	7	03/01/2002	03/01/2002	
IL	N	2	04/27/2001		
IL	R	6	03/01/2000		
IL	R	5	03/01/1998		
IL	R	4	03/01/1996		
IL	R	3	03/01/1994		
IL	R	2	03/01/1992		
IL	R	1	02/23/1990	02/23/1990	
IL	A	1	11/19/1980		
IL	N	1	08/18/1980		

[Site Detail Report](#)[Maintain Other IDs](#)[Historical Data](#)

Go To

[Back to the Transaction Menu](#)

URL: /rcrainfo/handler/handler_main.jsp



View a Site Identification Form



UNIVERSITY OF CHICAGO HOSPITAL

CHICAGO

ILD005421136

Navigational Shortcuts: [General Information](#) [Reason Site ID and Name](#) [Location](#) [Land Type](#) [NAICS](#) [Mailing](#) [Contact](#) [Owner and Operator](#) [Waste Activity](#) [Haz. Wastes](#) [Certification](#)

Last Updated By: HLB

Last Updated On: 09/10/2008

General Information

Received Date:*	03/01/2008	Non-notifier:	Select a Non-notifier	Extract to Public?	<input type="checkbox"/>
Accessibility:	Select an Accessibility	Send Acknowledgement:			

1. Reason for Submittal *

<input type="checkbox"/>	To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID Number for this location). [Source N]
<input type="checkbox"/>	To provide a Subsequent Notification (to update site identification information for this location). [Source N]
<input type="checkbox"/>	As a component of a First RCRA Hazardous Waste Part A Permit Application. [Source A]
<input type="checkbox"/>	As a component of a Revised RCRA Hazardous Waste Part A Permit Application. [Source A]
<input checked="" type="checkbox"/>	As a component of the Hazardous Waste Report. [Source R]
<input type="checkbox"/>	Implementer - Agency that is implementer of Record for Handler. [Source I]
<input type="checkbox"/>	Emergency. [Source E]
<input type="checkbox"/>	Temporary. [Source T]

2. Site ID

EPA ID:*	ILD005421136	Activity Location:*	IL	
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3. Site Name

Name:*	UNIVERSITY OF CHICAGO HOSPITAL
--------	--------------------------------

4. Site Location (Physical address, not P.O. Box or Route)

Number:					
Street 1:*	960 E 58TH ST				
Street 2:					
City, Town or Village:*	CHICAGO	County:*	COOK		
State:*	ILLINOIS	Country:*	UNITED STATES	Zip Code:*	60637
State District:	Select a State District				

5. Site Land Type *

Site Land Type:	Private
-----------------	---------

6. North American Industry Classification System (NAICS) [Hint](#)

NAICS A:*	62211 (Primary)	NAICS B:	61131	NAICS C:		NAICS D:	
-----------	--------------------	----------	-------	----------	--	----------	--

7. Site Mailing Address

Number:					
Street 1:*	5555 S ELLIS				
Street 2:					
City, Town or Village:*	CHICAGO				
State:*	ILLINOIS	Country:*	UNITED STATES	Zip Code:*	60637

8. Site Contact Person

First Name:*	STEVEN	Middle Initial:		Last Name:*	BEAUDOIN
Title:					

8a. Site Contact Address

Number:					
Street 1:					
Street 2:					
City, Town or Village:					
State:	Select a State	Country:	UNITED STATES	Zip Code:	
Email Address:					
Phone Number:*	7737029999	Ext:		Fax:	

9. Legal Owner and Operator * [Hint](#)

A. Legal Owner						
Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current
1	CO	P	UNIVERSITY OF CHICAGO	555 S ELLIS CHICAGO IL 60637 US	01/01/1890	
B. Legal Operator						
Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current
2	CP	P	UNIVERSITY OF CHICAGO	960 E 58TH ST CHICAGO IL 60637 US	07/15/1991	

10. Type of Federal Regulated Waste Activity

A. Hazardous Waste Activities (Complete all parts 1-7)	
1. Generator of Hazardous Waste (Federal)	2. Transporter of Hazardous Waste
Large Quantity Generator	<input type="checkbox"/> a. HW Transporter
	<input type="checkbox"/> b. HW Transfer Facility
Generator of Hazardous Waste (State)	<input type="checkbox"/> 3. Treater, Storer, or Disposer of Hazardous Waste <small>Note</small>
1 - Large Quantity Generator	<input type="checkbox"/> 4. Recycler of Hazardous Waste <small>Note</small>
	5. Exempt Boiler and / or Industrial Furnace

Indicate other generator activities (check all that apply).		<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> d. Short Term Generator <small>Note</small>		<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> e. United States Importer of Hazardous Waste		<input type="checkbox"/> 6. Underground Injection Control
<input checked="" type="checkbox"/> f. Mixed Waste (hazardous and radioactive) Generator		<input type="checkbox"/> 7. Receives Hazardous Waste from Off-site
B. Universal Waste Activities		C. Used Oil Activities
1. Large Quantity Handler of Universal Waste <small>Note</small>		1. Used Oil Transporter - Indicate types of activities.
Generated Accumulated/Managed		<input type="checkbox"/> a. Transporter
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> b. Transfer Facility
Mercury containing equipment	<input checked="" type="checkbox"/>	2. Used Oil Processor and / or Re-refiner - Indicate types of activities.
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> a. Processor
Pesticides	<input checked="" type="checkbox"/>	<input type="checkbox"/> b. Re-refiner
		<input type="checkbox"/> 3. Off-Specification Used Oil Burner
<input type="checkbox"/> 2. Destination Facility for Universal Waste <small>Note</small>		4. Used Oil Fuel Marketer - Indicate types of activities.
		<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
		<input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications
D. Eligible Academic Entities with Laboratories - Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K <small>Note</small>		
1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories. <small>Note</small>		
<input type="checkbox"/> a. College or University		
<input type="checkbox"/> b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university.		
<input type="checkbox"/> c. Non-profit institute that is owned by or has a formal written affiliation agreement with a college or university.		
<input type="checkbox"/> 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories.		
E. State Activities		
No State Activities Available.		

11. Description of Hazardous Waste <small>Hint</small>					Dropdown Size: 10
Type D <small>Select All / Remove All</small>	Type F <small>Select All / Remove All</small>	Type K <small>Select All / Remove All</small>	Type P <small>Select All / Remove All</small>	Type U <small>Select All / Remove All</small>	Type X <small>Select All / Remove All</small>
D001	F001	K001	LABP	U001	H142
D002	F002	K002	P001	U002	H143
D003	F003	K003	P002	U003	
D004	F004	K004	P003	U004	
D005	F005	K005	P004	U005	
D006	F006	K006	P005	U006	
D007	F007	K007	P006	U007	
D008	F008	K008	P007	U008	
D009	F009	K009	P008	U009	
D010	F010	K010	P009	U010	
Total D Selected: 0	Total F Selected: 0	Total K Selected: 0	Total P Selected: 0	Total U Selected: 0	Total X Selected: 0

12. Notification of Hazardous Secondary Material (HSM) Activity *

☐ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(ii), 40 CFR 261.4(a)(23),(24), or (25)?

13. Comments Clear Notes

Chars Remaining 4000

--

14. Certification *[Hint](#) [Read the certification.](#)

First Name:	M.I.:	Last Name:	Title:	Date Signed:
STEVEN		BEAUDOIN	SAFETY COORDINA	03/01/2008

Navigational Shortcuts: [General Information](#) [Reason Site ID and Name](#) [Location](#) [Land Type](#) [NAICS](#) [Mailing](#) [Contact](#) [Owner and Operator](#) [Waste Activity](#) [Haz. Wastes](#) [Certification](#)[Back to the Handler Main Menu](#)

URL: /rcrainfo/handler/siteidmntn.jsp



View a Site Identification Form



UNIVERSITY OF CHICAGO HOSPITAL

CHICAGO

ILD005421136

Navigational Shortcuts: [General Information](#) [Reason Site ID and Name](#) [Location](#) [Land Type](#) [NAICS](#) [Mailing Contact](#) [Owner and Operator](#) [Waste Activity](#) [Haz. Wastes](#) [Certification](#)

Last Updated By: HLB

Last Updated On: 09/10/2008

General Information

Received Date:*	03/01/2008	Non-notifier:	Select a Non-notifier	Extract to Public?	<input type="checkbox"/>
Accessibility:	Select an Accessibility	Send Acknowledgement:			

1. Reason for Submittal *

<input type="checkbox"/>	To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID Number for this location). [Source N]
<input type="checkbox"/>	To provide a Subsequent Notification (to update site identification information for this location). [Source N]
<input type="checkbox"/>	As a component of a First RCRA Hazardous Waste Part A Permit Application. [Source A]
<input type="checkbox"/>	As a component of a Revised RCRA Hazardous Waste Part A Permit Application. [Source A]
<input checked="" type="checkbox"/>	As a component of the Hazardous Waste Report. [Source R]
<input type="checkbox"/>	Implementer - Agency that is implementer of Record for Handler. [Source I]
<input type="checkbox"/>	Emergency. [Source E]
<input type="checkbox"/>	Temporary. [Source T]

2. Site ID

EPA ID:*	ILD005421136	Activity Location:*	IL
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3. Site Name

Name:*	UNIVERSITY OF CHICAGO HOSPITAL
--------	--------------------------------

4. Site Location (Physical address, not P.O. Box or Route)

Number:					
Street 1:*	960 E 58TH ST				
Street 2:					
City, Town or Village:*	CHICAGO	County:*	COOK		
State:*	ILLINOIS	Country:*	UNITED STATES	Zip Code:*	60637
State District:	Select a State District				

5. Site Land Type *

Site Land Type:	Private
-----------------	---------

6. North American Industry Classification System (NAICS) [Hint](#)

NAICS A:*	62211 (Primary)	NAICS B:	61131	NAICS C:		NAICS D:	
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7. Site Mailing Address

Number:					
Street 1:*	5555 S ELLIS				
Street 2:					
City, Town or Village:*	CHICAGO				
State:*	ILLINOIS	Country:*	UNITED STATES	Zip Code:*	60637

8. Site Contact Person

First Name:*	STEVEN	Middle Initial:		Last Name:*	BEAUDOIN
Title:					

8a. Site Contact Address

Number:					
Street 1:					
Street 2:					
City, Town or Village:					
State:	Select a State	Country:	UNITED STATES	Zip Code:	
Email Address:					
Phone Number:*	7737029999	Ext:		Fax:	

9. Legal Owner and Operator * [Hint](#)

A. Legal Owner

Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current
1	CO	P	UNIVERSITY OF CHICAGO	555 S ELLIS CHICAGO IL 60637 US	01/01/1890	

B. Legal Operator

Seq.	Ind.	Type	Name	Address	Date Became Current	Date Ended Current
2	CP	P	UNIVERSITY OF CHICAGO	960 E 58TH ST CHICAGO IL 60637 US	07/15/1991	

10. Type of Federal Regulated Waste Activity

A. Hazardous Waste Activities (Complete all parts 1-7)	
1. Generator of Hazardous Waste (Federal)	2. Transporter of Hazardous Waste
Large Quantity Generator	<input type="checkbox"/> a. HW Transporter
	<input type="checkbox"/> b. HW Transfer Facility
Generator of Hazardous Waste (State)	<input type="checkbox"/> 3. Treater, Storer, or Disposer of Hazardous Waste <small>Note</small>
1 - Large Quantity Generator	<input type="checkbox"/> 4. Recycler of Hazardous Waste <small>Note</small>
	5. Exempt Boiler and / or Industrial Furnace

Indicate other generator activities (check all that apply).		<input type="checkbox"/> a. Small Quantity On-site Burner Exemption
<input type="checkbox"/> d. Short Term Generator Note		<input type="checkbox"/> b. Smelting, Melting, Refining Furnace Exemption
<input type="checkbox"/> e. United States Importer of Hazardous Waste		<input type="checkbox"/> 6. Underground Injection Control
<input checked="" type="checkbox"/> f. Mixed Waste (hazardous and radioactive) Generator		<input type="checkbox"/> 7. Receives Hazardous Waste from Off-site
B. Universal Waste Activities		C. Used Oil Activities
1. Large Quantity Handler of Universal Waste Note		1. Used Oil Transporter - Indicate types of activities.
Generated Accumulated/Managed		<input type="checkbox"/> a. Transporter
Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/> b. Transfer Facility
Mercury containing equipment	<input checked="" type="checkbox"/>	2. Used Oil Processor and / or Re-refiner - Indicate types of activities.
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/> a. Processor
Pesticides	<input checked="" type="checkbox"/>	<input type="checkbox"/> b. Re-refiner
		<input type="checkbox"/> 3. Off-Specification Used Oil Burner
<input type="checkbox"/> 2. Destination Facility for Universal Waste Note		4. Used Oil Fuel Marketer - Indicate types of activities.
		<input type="checkbox"/> a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
		<input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications
D. Eligible Academic Entities with Laboratories - Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K Note		
1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories. Note		
<input type="checkbox"/> a. College or University		
<input type="checkbox"/> b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university.		
<input type="checkbox"/> c. Non-profit institute that is owned by or has a formal written affiliation agreement with a college or university.		
<input type="checkbox"/> 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories.		
E. State Activities		
No State Activities Available.		

11. Description of Hazardous Waste Hint					Dropdown Size: 10
Type D Select All / Remove All	Type F Select All / Remove All	Type K Select All / Remove All	Type P Select All / Remove All	Type U Select All / Remove All	Type X Select All / Remove All
D001	F001	K001	LABP	U001	H142
D002	F002	K002	P001	U002	H143
D003	F003	K003	P002	U003	
D004	F004	K004	P003	U004	
D005	F005	K005	P004	U005	
D006	F006	K006	P005	U006	
D007	F007	K007	P006	U007	
D008	F008	K008	P007	U008	
D009	F009	K009	P008	U009	
D010	F010	K010	P009	U010	
Total D Selected: 0	Total F Selected: 0	Total K Selected: 0	Total P Selected: 0	Total U Selected: 0	Total X Selected: 0

12. Notification of Hazardous Secondary Material (HSM) Activity *

- ☐ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(ii), 40 CFR 261.4(a)(23),(24), or (25)?

13. Comments [Clear Notes](#)

Chars Remaining 4000

--

14. Certification *[Hint](#) [Read the certification.](#)

First Name:	M.I.:	Last Name:	Title:	Date Signed:
STEVEN		BEAUDOIN	SAFETY COORDINA	03/01/2008

Navigational Shortcuts: [General Information](#) [Reason Site ID and Name](#) [Location](#) [Land Type](#) [NAICS](#) [Mailing Contact](#) [Owner and Operator](#) [Waste Activity](#) [Haz. Wastes](#) [Certification](#)[Back to the Handler Main Menu](#)

URL: /rcrainfo/handler/siteidmntn.jsp



Handler Details



UNIVERSITY OF CHICAGO HOSPITAL

CHICAGO

ILD005421136

Universes for Illinois

View Universes for IL

Handler Universes

Active Status	Controls in Place	In a Universe	Gen. Status	Transporter	Univ. Waste	Recycler	Used Oil	Furnace Exempt	Importer	Onsite Burner Exempt	Mixed Waste Gen.	Underground Injection
H----	N	Y	LQG	N	Y	N	NNNNNNNN	N	N	N	Y	N

Permitting and Corrective Action Universes

Permit Workload	Closure Workload	Post-Closure Workload	Permit Progress	CA Workload	Subject to CA	Subject to CA - TSD	Subject to CA - Discretion	Subject to CA - Non-TSD
-----	-----	-----	---S-	N	Y	N	Y	N

Compliance, Monitoring and Enforcement and GPRA Universes

Full Enforcement	Operating TSDF	SNC	BOYSNC	Permit GPRA	Renewals GPRA	CA GPRA
-----	-----	N	N	+	N	Y

Source Summary Table

** indicates this source record was used for the Universe Calculations.

Act. Loc.	▲ Source ▼	Sequence	▲ Receipt date ▼	▲ Certification date ▼	Non-notifier
IL	** R	10	03/01/2008	03/01/2008	
IL	R	9	03/01/2006	03/01/2006	
IL	R	8	03/01/2004	03/01/2004	
IL	R	7	03/01/2002	03/01/2002	
IL	N	2	04/27/2001		
IL	R	6	03/01/2000		
IL	R	5	03/01/1998		
IL	R	4	03/01/1996		
IL	R	3	03/01/1994		
IL	R	2	03/01/1992		
IL	R	1	02/23/1990	02/23/1990	
IL	A	1	11/19/1980		
IL	N	1	08/18/1980		

[Site Detail Report](#)[Maintain Other IDs](#)[Historical Data](#)

Go To

[Back to the Transaction Menu](#)

URL: /rcrainfo/handler/handler_main.jsp

RCRA Site Detail

Report run on: May 24, 2010 - 9:35 AM

Version 5.0

User Selection Criteria

Handler EPA ID: ILD005421136

History: All records

BR Cycles: Show all

Results

Data meeting the criteria you selected follows.

Total Pages: 19

Report Description

The RCRA Site Detail report provides "all available details" from the handler module and summarized information from the waste activity monitoring module for one RCRA site. The report integrates National Biennial RCRA Hazardous Waste Report data with Site Identification data.

Details reported about the RCRA site include basic handler module information; the standard suite of universes; information about each source record received for the facility, including basic information, location and mailing address, source record and permit contact person (including historical records), list of NAICS codes, complete list of regulated waste activities; and summarized National Biennial RCRA Hazardous Waste Report information by reporting cycle year, including quantity totals (generated, managed, shipped, received), and top ten GM forms by quantity generated. Top ten GM form list shows reported waste description, quantities, onsite and offsite system types, and EPA and State waste codes.

Information listed for the RCRA site can be limited by latest historical information and most recent BR cycle.

Data is sorted by the most recent Received Date. If more than one record has the same Received Date, the data is sorted by Source Type (I-Implementer; N-Notification, B-Biennial Report with Subsequent Notification, R-Biennial Report, A-Part A, T-Temporary, E-Emergency).

Report Information

Name: h_site_detail.rdf
Developed by: EPA Headquarters, Office of Resource Conservation and Recovery
Deployed: November 2002
Last Revised: April 2010
Contact: rcrainfo.help@epa.gov
Tables Used: hbasic, hreport_univ5, gis4, gis_lat_long4, lu_generator_status, hother_id5, hpart_a5, hhandler5, lu_generator_status, lu_country, howner_operator5, hnaics5, lu_naics, hstate_activity5, lu_state_activity, hother_permit5, lu_other_permit, huniversal_waste5, lu_universal_waste, hwaste_code5, bgm_basic, bgm_onsite_treatment, bgm_offsite_shipment, bgm_waste_code, lu_management_method, lu_state, hid_groups
Libraries: none

NOTE: Some data is suppressed if it is null or blank. See documentation in RCRAInfo Help for details.

RCRA Site Detail

Report run on: May 24, 2010 - 9:35 AM

Page 2

List of Hazardous Waste Code Descriptions

Please run the lookup table report for LU_WASTE_CODES for description of federal and state waste codes in this report.

List of Handler Universe Abbreviations

Active	Active Status -- Indicates that the facility could be subject to the federal RCRA, Subtitle C or a state's authorized hazardous waste program. This definition has no legally enforceable or binding determination about the status of a particular site or the obligations of an owner or operator.
Commercial TSDF	Commercial TSDF -- Indicates that the facility is a commercial operator of transporting, storing and disposing of hazardous waste.
EI Indicator (HE/GW)	Environmental Indicator (Human Exposure/Groundwater Release) -- Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist). GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist).
Federal Generator	Federal Generator Status -- Indicates the regulatory status of the site as determined by the quantity and/or toxicity of hazardous wastes generated, stored or accumulated over a specified period of time.
HSM	HSM -- Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
IC In Place	Institutional Controls in Place -- Indicates that the facility has Institutional Controls in place ('Y' indicates that the facility is in the universe).
Importer	Importer -- Indicates that the facility imports hazardous waste into the United States from a foreign country.
Mixed Waste Generator	Mixed Waste Generator -- Indicates that the facility is a generator or TSDF that handles waste mixed with nuclear source, special nuclear or by-product material.
Operating TSDF	Operating TSDF -- Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment).
Short Term Generator	Short Term Generator -- Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
State Generator	State Generator Status -- Indicates the regulatory status of the site in view of implementing the State's "broader in scope" or "more stringent than" rules. Although an implementing State might use terms that differ for their generators these terms would be translated to match the Federal regulatory term.
Transporter	Transporter -- Indicates that the facility is engaged in the off-site transportation of hazardous waste. ('Y' indicates that the facility is in this universe).

RCRA Site Detail

Report run on: May 24, 2010 - 9:35 AM

Page 3

UNIVERSITY OF CHICAGO HOSPITAL				ILD005421136	
Region: 05 Extract: Y County: COOK			State District:		
Universes	Federal Generator: LQG	Transporter: N	Operating TSDF: ----	Active: Y	
	State Generator: 1	Importer: N	Commercial: N	El Indicator (HE / GW): N / N	
	Short Term Generator: N	Mixed Waste Generator: Y	HSM: N	IC In Place: N	

Latitude/Longitude Measure - Owner: 05	Seq #: 1	
Geometric Type Code: 001	Horizontal Collection Method:	Reference Point Code:
Horizontal Accuracy Measure:	Horizontal Reference Datum:	Source Map Scale Numbers:
Coordinates: 41.789468, -87.60111		

Latitude/Longitude Measure - Owner: 05	Seq #: 2	
Coordinates:		

Receive Date: 03/01/2008	Source Type: Biennial Report	Seq. Number: 10	Report Cycle: 2007
---------------------------------	-------------------------------------	------------------------	---------------------------

Location 960 E 58TH ST Address: CHICAGO, IL 60637	Mailing Address: 5555 S ELLIS CHICAGO, IL 60637 UNITED STATES
--	--

Contact Person STEVEN BEAUDOIN	
For Source Information (773) 702-9999	

Owner (current)	555 S ELLIS	Type: Private
UNIVERSITY OF CHICAGO	CHICAGO, IL 60637	Phone:
From: 01/01/1890 To:	CHICAGO	

Operator (current)	960 E 58TH ST	Type: Private
UNIVERSITY OF CHICAGO	CHICAGO, IL 60637	Phone:
From: 07/15/1991 To:	CHICAGO	

Land Type: Private	Non Notifier: No	TSD Date:	Accessibility:
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NAICS Codes:	61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS
	62211 GENERAL MEDICAL AND SURGICAL HOSPITALS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: IL-1 Large Quantity Generator

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	Yes
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Exempt Boiler and/or Industrial Furnace	
Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No
Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities			
Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No	
Transporter:	No		
Transfer Facility:	No		
Used Oil Processor and/or Re-refiner Activity	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No	
Processor:	No		
Refiner:	No		
Marketer who first claims the used oil meets the specifications:	No		
Subpart K			
College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

Universal Waste Activities:		Generated	Accumulated/Managed
Description			
Batteries			Y
Lamps			Y
Pesticides			Y
Mercury containing equipment			Y

2007 Biennial Report Information	Click Here for Biennial Report Detail
---	---

Total Quantity Reported (Tons): Generated: 86 Managed: 0 Shipped: 82 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)				
Generated	Managed	On-site Management Methods	Shipped	Off-site Management Methods

RCRA Site Detail

Report run on: May 24, 2010 - 9:35 AM

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Receive Date: 03/01/2008

Source Type: Biennial Report

Seq. Number: 10

Report Cycle: 2007

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
28	0		28	H061 - FUEL BLENDING H071 - CHEMICAL REDUCTION H077 - OTHER CHEMICAL PRECIPITATION H121 - NEUTRALIZATION ONLY H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: LABP				
8	0		8	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D002 , D008				
7	0		3	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D011				
1	0		1	H071 - CHEMICAL REDUCTION
EPA Waste Codes: D002				
1	0		1	H121 - NEUTRALIZATION ONLY
EPA Waste Codes: D002				
1	0		1	H061 - FUEL BLENDING H121 - NEUTRALIZATION ONLY
EPA Waste Codes: D002				
1	0		1	H061 - FUEL BLENDING
EPA Waste Codes: D001 , F003 , F005				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D009				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D008				
0	0		0	H071 - CHEMICAL REDUCTION H075 - CHEMICAL OXIDATION H121 - NEUTRALIZATION ONLY H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: LABP				

RCRA Site Detail

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Effective Date: 03/01/2006	Source Type: Biennial Report	Seq. Number: 9	Report Cycle: 2005
Location: 960 E 58TH ST Address: CHICAGO, IL 60637		Mailing Address: 5555 S ELLIS CHICAGO, IL 60637 UNITED STATES	

Contact Person: STEVEN BEAUDOIN
For Source Information: (773) 702-9999

Owner (current): UNIVERSITY OF CHICAGO
From: 01/01/1890 **To:** 555 S ELLIS CHICAGO, IL 60637 CHICAGO
Type: Private
Phone:

Operator (current): UNIVERSITY OF CHICAGO
From: 07/15/1991 **To:** 960 E 58TH ST CHICAGO, IL 60637 CHICAGO
Type: Private
Phone:

Land Type: Private **Non Notifier:** No **TSD Date:** **Accessibility:**
NAICS Codes: 61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS
 62211 GENERAL MEDICAL AND SURGICAL HOSPITALS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; **State:** IL-1 Large Quantity Generator

Other Hazardous Waste Generator Activities

Used Oil Activities

Short Term Generator:	No	Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Importer Activity:	No	Transporter:	No	
Mixed Waste Generator:	Yes	Transfer Facility:	No	
Transporter Activity:	No	Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
Transfer Facility:	No		Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
TSD Activity:	No	Processor:	No	
Recycler Activity:	No	Refiner:	No	
Exempt Boiler and/or Industrial Furnace		Subpart K	Marketer who first claims the used oil meets the specifications:	No
Small Quantity Onsite Burner Exemption:	No	College/University:	No	
Smelting, Melting, Refining Furnace Exemption:	No	Teaching Hospital:	No	
Underground Injection Control:	No	Non-profit Research Institute:	No	
Destination Facility for Universal Waste:	No	Withdrawal:	No	

Universal Waste Activities:		Generated	Accumulated/Managed
Description			
Batteries			N
Lamps			N
Pesticides			N
Mercury containing equipment			N

2005 Biennial Report Information [Click Here for Biennial Report Detail](#)

Total Quantity Reported (Tons): Generated: 86 Managed: 0 Shipped: 86 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	On-site Management Methods	Shipped	Off-site Management Methods
33	0		34	H061 - FUEL BLENDING H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001 , D018 , F002 , F003 , F005				
11	0		11	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D002 , D008				
4	0		4	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D011				
1	0		1	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D009				
1	0		1	H071 - CHEMICAL REDUCTION
EPA Waste Codes: D002				

RCRA Site Detail

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Receive Date: 03/01/2006 Source Type: Biennial Report Seq. Number: 9 Report Cycle: 2005

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
1	0		1	H061 - FUEL BLENDING H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001 , F003 , F005				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D006				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D009				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: LABP				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D003				

RCRA Site Detail

Report run on: May 24, 2010 - 9:35 AM

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Effective Date: 03/01/2004	Source Type: Biennial Report	Seq. Number: 8	Report Cycle: 2003
Location: 960 E 58TH ST Address: CHICAGO, IL 60637		Mailing Address: 5555 S ELLIS CHICAGO, IL 60637 UNITED STATES	

Contact Person STEVEN BEAUDOIN
 For Source Information (773) 702-9999

Owner (current) UNIVERSITY OF CHICAGO From: 01/01/1890 To:	555 S ELLIS CHICAGO, IL 60637 CHICAGO	Type: Private Phone:
Operator (current) UNIVERSITY OF CHICAGO From: 07/15/1991 To:	960 E 58TH ST CHICAGO, IL 60637 CHICAGO	Type: Private Phone:

Land Type: Private	Non Notifier: No	TSD Date:	Accessibility:
NAICS Codes: 61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS 62211 GENERAL MEDICAL AND SURGICAL HOSPITALS			

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: IL-1 Large Quantity Generator

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	Yes
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No

Exempt Boiler and/or Industrial Furnace	
Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No

Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities

Used Oil Transporter Activity		Off-Specification Used Oil Burner:	No
Transporter:	No	Used Oil Fuel Marketer Activity	
Transfer Facility:	No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Used Oil Processor and/or Re-refiner Activity		Marketer who first claims the used oil meets the specifications:	No
Processor:	No		
Refiner:	No		
Subpart K			
College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

2003 Biennial Report Information [Click Here for Biennial Report Detail](#)

Total Quantity Reported (Tons): Generated: 85 Managed: 0 Shipped: 88 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	On-site Management Methods	Shipped	Off-site Management Methods
21	0		21	H061 - FUEL BLENDING H129 - OTHER TREATMENT H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001 , D018 , F002 , F003 , F005				
14	0		14	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D002 , D008				
13	0		13	H061 - FUEL BLENDING H071 - CHEMICAL REDUCTION H075 - CHEMICAL OXIDATION H121 - NEUTRALIZATION ONLY
EPA Waste Codes: LABP				
2	0		2	H061 - FUEL BLENDING H071 - CHEMICAL REDUCTION H121 - NEUTRALIZATION ONLY H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
A Waste Codes: D011				
2	0		2	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D009				

RCRA Site Detail

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Receive Date: 03/01/2004 Source Type: Biennial Report Seq. Number: 8 Report Cycle: 2003

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
1	0		1	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D009				
1	0		1	H111 - STABILIZATION OR CHEMICAL FIXATION
EPA Waste Codes: D002				
1	0		1	H061 - FUEL BLENDING H129 - OTHER TREATMENT H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001 , F003 , F005				
1	0		1	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D008				
1	0		1	H111 - STABILIZATION OR CHEMICAL FIXATION H121 - NEUTRALIZATION ONLY
EPA Waste Codes: D002				

RCRA Site Detail

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Effective Date: 03/01/2002	Source Type: Biennial Report	Seq. Number: 7	Report Cycle: 2001
Location: 960 E 58TH ST Address: CHICAGO, IL 60637		Mailing Address: 5555 S. ELLIS CHICAGO, IL 60637 UNITED STATES	

Contact Person STEVEN BEAUDOIN
 For Source Information (773) 702-9999

Owner (current) UNIVERSITY OF CHICAGO
 From: 01/01/1890 To: CHICAGO, IL 60637
 Type: Private
 Phone:

Operator (current) UNIVERSITY OF CHICAGO
 From: 07/15/1991 To: CHICAGO, IL 60637
 Type: Private
 Phone:

Land Type: Private Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS
 62211 GENERAL MEDICAL AND SURGICAL HOSPITALS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: IL-1 Large Quantity Generator

Other Hazardous Waste Generator Activities

Used Oil Activities

Short Term Generator:	No	Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Importer Activity:	No	Transporter:	Used Oil Fuel Marketer Activity	
Mixed Waste Generator:	Yes	Transfer Facility:	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Transporter Activity:	No	Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications:	No
Transfer Facility:	No	Processor:		
TSD Activity:	No	Refiner:		
Recycler Activity:	No	Subpart K		
Exempt Boiler and/or Industrial Furnace		College/University:	Non-profit Research Institute:	No
Small Quantity Onsite Burner Exemption:	No	Teaching Hospital:	Withdrawal:	No
Smelting, Melting, Refining Furnace Exemption:	No			
Underground Injection Control:	No			
Destination Facility for Universal Waste:	No			

Universal Waste Activities:

Description	Generated	Accumulated/Managed
Batteries		Y
Lamps		Y
Pesticides		Y
Mercury containing equipment		Y

2001 Biennial Report Information

[Click Here for Biennial Report Detail](#)

Total Quantity Reported (Tons): Generated: 74 Managed: 0 Shipped: 74 Received: 0

Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	On-site Management Methods	Shipped	Off-site Management Methods
18	0		18	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: LABP				
8	0		8	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D002 , D008				
6	0		6	H061 - FUEL BLENDING
EPA Waste Codes: D001 , D018 , F002 , F003 , F005				
5	0		5	H129 - OTHER TREATMENT
EPA Waste Codes: LABP				
4	0		4	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D009				

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Receive Date: 03/01/2002 Source Type: Biennial Report Seq. Number: 7 Report Cycle: 2001

Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
3	0		3	H075 - CHEMICAL OXIDATION
EPA Waste Codes: D002				
2	0		2	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D011				
2	0		2	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D006				
1	0		1	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D008				
1	0		1	H061 - FUEL BLENDING
EPA Waste Codes: D001 , F003 , F005				

RCRA Site Detail

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Effective Date: 04/27/2001		Source Type: Notification		Seq. Number: 2	
./Previous Site Name: UNIVERSITY OF CHICAGO					
Location 5801 S ELLIS AVE Address: CHICAGO, IL 60637			Mailing Address: 555 SOUTH ELLIS AVENUE CHICAGO, IL 60637		
Contact Person JOHN BIVONNA For Source (312) 702-1054 Information			555 SOUTH ELLIS AVENUE CHICAGO, IL 60637 UNITED STATES		
Owner (current)		5801 S ELLIS AVE		Type: Private	
UNIVERSITY OF CHICAGO		CHICAGO, IL 60637		Phone: (312) 753-1234	
From: 01/01/0001 To:					
Land Type: Other land type	Non Notifier: No	TSD Date:	Accessibility:		
Notes: one time cleanup of mercury debris					
Regulated Waste Activities					
Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:					
Other Hazardous Waste Generator Activities					
Short Term Generator: No		Used Oil Activities			
Importer Activity: No		Used Oil Transporter Activity		Off-Specification Used Oil Burner: No	
Mixed Waste Generator: Yes		Transporter: No		Used Oil Fuel Marketer Activity	
Transporter Activity: No		Transfer Facility: No		Marketer who directs shipment off-specification used oil to off-specification used oil burner: No	
Transfer Facility: No		Used Oil Processor and/or Re-refiner Activity		Marketer who first claims the used oil meets the specifications: No	
TSD Activity: Yes		Processor: No			
Recycler Activity: No		Refiner: No			
Exempt Boiler and/or Industrial Furnace		Subpart K			
Small Quantity Onsite Burner Exemption: No		College/University: No		Non-profit Research Institute: No	
Smelting, Melting, Refining Furnace Exemption: No		Teaching Hospital: No		Withdrawal: No	
Underground Injection Control: No					
Destination Facility for Universal Waste: No					
Notification of Hazardous Secondary Material Activity: No					

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D000 D001 D002 D003 D004 D005 D006 D007 D008 D009 D011 D013 D016 F001 F002 F003 F004 F005 K001 K006 K009 K012 K021 P004 P022 P030 P032 P034 P035 P050 P053 P072 P077 P087 P089 P090 P117 U002 U003 U007 U009 U012 U013 U014 U019 U020 U021 U031 U034 U044 U056 U057 U069 U077 U080 U103 U108 U112 U117 U122 U123 U124 U133 U134 U144 U154 U159 U165 U168 U169 U188 U196 U197 U211 U213 U219 U220 U228 U232 U239 U242 U244 U246

RCRA Site Detail

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Receive Date: 03/01/2000	Source Type: Biennial Report	Seq. Number: 6	Report Cycle: 1999
Location 5801 S ELLIS AVE Address: CHICAGO, IL 60637		Mailing 5555 S ELLIS Address: CHICAGO, IL 60637	

Contact Person STEVEN BEAUDOIN
 For Source (773) 702-9999
 Information

Land Type: Bad code - U Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Other Hazardous Waste Generator Activities

Used Oil Activities

Short Term Generator:	No	Used Oil Transporter Activity		Off-Specification Used Oil Burner:	No
Importer Activity:	No	Transporter:	No	Used Oil Fuel Marketer Activity	
Mixed Waste Generator:	Yes	Transfer Facility:	No	* Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Transporter Activity:	No	Used Oil Processor and/or Re-refiner Activity		Marketer who first claims the used oil meets the specifications:	No
Transfer Facility:	No	Processor:	No		
TSD Activity:	No	Refiner:	No		
Recycler Activity:	No				
Exempt Boiler and/or Industrial Furnace		Subpart K			
Small Quantity Onsite Burner Exemption:	No	College/University:	No	Non-profit Research Institute:	No
Smelting, Melting, Refining Furnace Exemption:	No	Teaching Hospital:	No	Withdrawal:	No
Underground Injection Control:	No				
Destination Facility for Universal Waste:	No				

1999 Biennial Report Information

No Biennial Report detail information available.

RCRA Site Detail

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Effective Date: 03/01/1998		Source Type: Biennial Report		Seq. Number: 5		Report Cycle: 1997	
Location: 5801 S ELLIS AVE Address: CHICAGO, IL 60637				Mailing Address: 5555 S ELLIS CHICAGO, IL 60637			
Contact Person: STEVEN BEAUDOIN For Source Information: (773) 702-9999							
Land Type: Bad code - U		Non Notifier: No		TSD Date:		Accessibility:	
NAICS Codes: 61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS							
Regulated Waste Activities							
Hazardous Waste Generator Status - Federal: Large Quantity Generator, State:							
Other Hazardous Waste Generator Activities							
Short Term Generator: No Importer Activity: No Mixed Waste Generator: Yes				Used Oil Activities			
Transporter Activity: No Transfer Facility: No TSD Activity: No Recycler Activity: No				Used Oil Transporter Activity Transporter: No Transfer Facility: No			
Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: No Smelting, Melting, Refining Furnace Exemption: No				Off-Specification Used Oil Burner: No Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: No Marketer who first claims the used oil meets the specifications: No			
Underground Injection Control: No Destination Facility for Universal Waste: No				Subpart K College/University: No Teaching Hospital: No			
Non-profit Research Institute: No Withdrawal: No							
1997 Biennial Report Information							
No Biennial Report detail information available.							

RCRA Site Detail

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Receive Date: 03/01/1996	Source Type: Biennial Report	Seq. Number: 4	Report Cycle: 1995
Location 5801 S ELLIS AVE Address: CHICAGO, IL 60637		Mailing 970 EAST 58TH STREET Address: CHICAGO, IL 60637	

Contact Person STEVEN BEAUDOIN
 For Source (312) 702-9999
 Information

Land Type: Bad code - U Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator, State:

Other Hazardous Waste Generator Activities

Used Oil Activities	
Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	Yes
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	No
Recycler Activity:	No
Exempt Boiler and/or Industrial Furnace	
Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No
Underground Injection Control:	No
Destination Facility for Universal Waste:	No
Used Oil Transporter Activity	No
Transporter:	No
Transfer Facility:	No
Used Oil Processor and/or Re-refiner Activity	No
Processor:	No
Refiner:	No
Off-Specification Used Oil Burner:	No
Used Oil Fuel Marketer Activity	
Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Marketer who first claims the used oil meets the specifications:	No
Subpart K	
College/University:	No
Teaching Hospital:	No
Non-profit Research Institute:	No
Withdrawal:	No

1995 Biennial Report Information

No Biennial Report detail information available.

RCRA Site Detail

Report run on: May 24, 2010 - 9:35 AM

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Effective Date: 03/01/1994	Source Type: Biennial Report	Seq. Number: 3	Report Cycle: 1993
Location: 5801 S ELLIS AVE Address: CHICAGO, IL 60637		Mailing Address: 970 E 58TH 4TH-FLOOR CHICAGO, IL 60637	

Contact Person STEVEN BEAUDOIN
 For Source (312) 702-9999
 Information

Land Type: Bad code - U Non Notifier: No TSD Date: Accessibility:

NAICS Codes: 61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Other Hazardous Waste Generator Activities

Short Term Generator: No
 Importer Activity: No
 Mixed Waste Generator: Yes
 Transporter Activity: No
 Transfer Facility: No
 TSD Activity: No
 Recycler Activity: No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: No
 Smelting, Melting, Refining Furnace Exemption: No

Underground Injection Control: No
 Destination Facility for Universal Waste: No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	Used Oil Fuel Marketer Activity	
Transfer Facility:	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Used Oil Processor and/or Re-refiner Activity	Marketer who first claims the used oil meets the specifications:	No
Processor:		
Refiner:		

Subpart K

College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

1993 Biennial Report Information

No Biennial Report detail information available.

RCRA Site Detail

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Receive Date: 03/01/1992	Source Type: Biennial Report	Seq. Number: 2	Report Cycle: 1991
Location 5801 S ELLIS AVE Address: CHICAGO, IL 60637		Mailing 5747 S ELLIS AVE Address: CHICAGO, IL 60637	

Contact Person SAM WANG
For Source (312) 962-7094
Information

Land Type: Bad code - U **Non Notifier:** No **TSD Date:** **Accessibility:**

NAICS Codes: 61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator, **State:**

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	Yes
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	Yes
Recycler Activity:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No

Underground Injection Control:	No
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Destination Facility for Universal Waste:	No
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Used Oil Activities

Used Oil Transporter Activity		Off-Specification Used Oil Burner:	No
Transporter:	No	Used Oil Fuel Marketer Activity	
Transfer Facility:	No	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Used Oil Processor and/or Re-refiner Activity		Marketer who first claims the used oil meets the specifications:	No
Processor:	No		
Refiner:	No		

Subpart K

College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

1991 Biennial Report Information

No Biennial Report detail information available.

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Effective Date: 02/23/1990	Source Type: Biennial Report	Seq. Number: 1	Report Cycle: 1989
Location: 5801 S ELLIS AVE Address: CHICAGO, IL 60637		Mailing Address: 5841 S MARYLAND AVE P. O. BOX 419 CHICAGO, IL 60637	

Contact Person: NORMAN H NACHTRIEB
For Source Information: (312) 962-7094

Land Type: Bad code - U	Non Notifier: No	TSD Date:	Accessibility:
NAICS Codes: 61131 COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS			

Notes: THE UNIVERSITY GENERATES WASTE CHEMICALS (OR UNUSED PORTIONS OF CHEMICALS) OF ALL DIFFERENT VARIETIES AND EACH IN SMALL QUANTITIES. THEY ARE FROM SEVERAL HUNDRED LABORATORIES INVOLVED IN RESEARCH AND INSTRUCTION. THERE IS THEREFORE NO SINGLE

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; **State:**

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	Yes
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	Yes
Recycler Activity:	No
Exempt Boiler and/or Industrial Furnace	
Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No
Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	No	
Transfer Facility:	No	
Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
Processor:	Marketer who directs shipment of off-specification used oil to off-specification used oil burner:	No
Refiner:	Marketer who first claims the used oil meets the specifications:	No
Subpart K		
College/University:	No	Non-profit Research Institute: No
Teaching Hospital:	No	Withdrawal: No

1989 Biennial Report Information

No Biennial Report detail information available.

RCRA Site Detail

Report run on: May 24, 2010 - 9:35 AM

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Receive Date: 11/19/1980 Source Type: Part A Seq. Number: 1

Other/Previous Site Name: UNIVERSITY OF CHICAGO

Location 5801 S ELLIS AVE Address: CHICAGO, IL 60637	Mailing 555 SOUTH ELLIS AVENUE Address: CHICAGO, IL 60637
---	--

Contact Person NORMAN NACHTRIEB For Source (312) 962-7094 Information	5735 SOUTH ELLIS AVENUE CHICAGO, IL 60637 UNITED STATES
--	---

Operator (current) UNIVERSITY OF CHICAGO From: To:	5801 S ELLIS AVE CITY NOT REPORTED, IL 99998	Type: Private Phone: (312) 753-1234
---	---	--

Land Type: Other land type	Non Notifier: No	TSD Date:	Accessibility:
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NAICS Codes:	61111	ELEMENTARY AND SECONDARY SCHOOLS
	61131	COLLEGES, UNIVERSITIES, AND PROFESSIONAL SCHOOLS
	62211	GENERAL MEDICAL AND SURGICAL HOSPITALS
	62231	SPECIALTY (EXCEPT PSYCHIATRIC AND SUBSTANCE ABUSE) HOSPITALS

Notes: one time cleanup of mercury debris

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Not a Generator; State: HQ-N Not a Generator

Other Hazardous Waste Generator Activities

Short Term Generator: No Importer Activity: No Mixed Waste Generator: Yes Transporter Activity: No Transfer Facility: No TSD Activity: Yes Recycler Activity: No Exempt Boiler and/or Industrial Furnace Small Quantity Onsite Burner Exemption: No Smelting, Melting, Refining Furnace Exemption: No Underground Injection Control: No Destination Facility for Universal Waste: No	Used Oil Activities Used Oil Transporter Activity Transporter: No Transfer Facility: No Used Oil Processor and/or Re-refiner Activity Processor: No Refiner: No Subpart K College/University: No Teaching Hospital: No	Off-Specification Used Oil Burner: No Used Oil Fuel Marketer Activity Marketer who directs shipment off-specification used oil to off-specification used oil burner: No Marketer who first claims the used oil meets the specifications: No Non-profit Research Institute: No Withdrawal: No
---	--	---

Other Permits:				
Number	Description	Owner	Type	Type Description
03010330		HQ	Z	Other non-federal program
03010332		HQ	Z	Other non-federal program
03010333		HQ	Z	Other non-federal program
801191		HQ	Z	Other non-federal program

Notification of Hazardous Secondary Material Activity: No

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001 D002 D003 D004 D005 D006 D007 D008 D009 D011 D013 D016 F001 K006 P030 P034 P050 P072 P077 P087 P089 U002 U009 U012 U014 U019 U021 U031 U034 U044 U056 U057 U069 U077 U080 U108 U112 U117 U122 U144 U154 U159 U165 U168 U169 U188 U196 U197 U211 U213 U219 U220 U228 U232 U239 U242 U244 U246

RCRA Site Detail

Report run on: May 24, 2010 - 9:35 AM

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ive Date: 08/18/1980	Source Type: Notification	Seq. Number: 1
----------------------	---------------------------	----------------

Previous Site Name: UNIVERSITY OF CHICAGO

Location: 5801 S ELLIS AVE Address: CHICAGO, IL 60637	Mailing Address: 555 SOUTH ELLIS AVENUE CHICAGO, IL 60637
--	--

Land Type: Other land type Non Notifier: No TSD Date: Accessibility:

Notes: one time cleanup of mercury debris

Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Other Hazardous Waste Generator Activities

Short Term Generator:	No
Importer Activity:	No
Mixed Waste Generator:	Yes
Transporter Activity:	No
Transfer Facility:	No
TSD Activity:	Yes
Recycler Activity:	No

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption:	No
Smelting, Melting, Refining Furnace Exemption:	No

Underground Injection Control:	No
Destination Facility for Universal Waste:	No

Used Oil Activities

Used Oil Transporter Activity	Off-Specification Used Oil Burner:	No
Transporter:	No	
Transfer Facility:	No	
Used Oil Processor and/or Re-refiner Activity	Used Oil Fuel Marketer Activity	
	Marketer who directs shipment off-specification used oil to off-specification used oil burner:	No
Processor:	No	
Refiner:	No	
	Marketer who first claims the used oil meets the specifications:	No

Subpart K

College/University:	No	Non-profit Research Institute:	No
Teaching Hospital:	No	Withdrawal:	No

* End of Report *



Series List



UNIVERSITY OF CHICAGO HOSPITAL CHICAGO

ILD005421136

[Show All Events](#)

2 Series(s) found.

						Go To	
Series						Events	
	Seq#	Series Name	Resp Person	Notes		Count	
1	1	APP01				13	Hide Events

Event Code	Event Description	Agency	Scheduled Date	Actual Date	Resp Person	Suborg
CL380CA	CLOSURE VERIFICATION-CLEAN CLOSURE ACCEPTABLE	S		07/18/2006	RWW	
CL360ME	CLOSURE PLAN APPROVED - FINAL CLOSURE	S		06/30/2005	RWW	
OP270	PERMIT EXPIRATION DATE	S		08/19/2001	SXN	
OP240OH	MODIFICATION DETERMINATION-OTHER THAN AC, CA, OR GW	S		08/31/1994	IL	
OP23110	CLASS DETERMINATION-CLASS 1 MOD,NO PRIOR APPROVAL REQUIRED	S		08/31/1994	IL	
OP242SI	SIGNIFICANCE DETERMINATION-SIGNIFICANT	S		08/31/1994	IL	
OP230OH	MODIFICATION REQUEST RECEIVED-MOD. OTHER	S		08/02/1994	IL	
OP205	FINAL PERMIT EFFECTIVE	S		08/19/1991	SXN	
OP200PG	FINAL DETERMINATION-RCRA PERMIT ISSUED WITH HSWA, NO CA	E		07/15/1991	R5	
OP200PP	FINAL DETERMINATION-RCRA PERMIT ISSUED, NO HSWA PERMIT YET	S		07/15/1991	IL	
OP160DP	PUBLIC NOTICE-DRAFT PERMIT	S		12/18/1990		
OP020	PART B RECEIVED	S		11/08/1988	ILJER	

	OP010	PART B CALL-IN	S		05/06/1988		
Series						Events	
	Seq#	Series Name	Resp Person	Notes		Count	
2	2	APP02	IL			6	Show Events

URL: /rcrainfo/pmt/PMT_series_list_events.jsp



Series List



UNIVERSITY OF CHICAGO HOSPITAL CHICAGO

ILD005421136

[Show All Events](#)

2 Series(s) found.

						Go To
Series						Events
	Seq#	Series Name	Resp Person	Notes	Count	
1	1	APP01			13	Show Events
2	2	APP02	IL		6	Hide Events

Event Code	Event Description	Agency	Scheduled Date	Actual Date	Resp Person	Suborg
CL380CA	CLOSURE VERIFICATION - CLEAN CLOSURE ACCEPTABLE	S		06/20/1989		
CL414	FACILITY RELEASED FROM CLOSURE FINANCIAL ASSURANCE REQUIREMENT	S		06/20/1989	IL	
CL372CA	REVIEW CLOSURE CERTIFICATION ACCEPTABLE	S		03/31/1989		
CL360MO	CLOSURE PLAN APPROVED - PARTIAL CLOSURE	S		08/23/1988		
CL340	PUBLIC NOTICE - CLOSURE	S		03/24/1988		
CL310	PLAN RECEIVED - CLOSURE	S		03/17/1988		

URL: /rcrainfo/pmt/PMT_series_list_events.jsp

Comp. Comprehensive Compliance Monitoring and Enforcement Report

Report run on: May 24, 2010 - 9:39 AM

Version: 5.0

User Selection Criteria

Location:	Illinois, all activities	Activity Location:	None Chosen
Handler ID:	ILD005421136	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	No Additional Restrictions		
Evaluation Date Range:	From Date: 10/01/1990 To Date: 05/24/2010		
Location County Code:	None Chosen	Extract Flag:	Include All Sites
Location City:		Evaluation Suborganization:	
Location Zip Code:		Evaluation Person:	
State District:		Evaluation Focus Area:	
Federal Facilities:	No, Show All	Only Eval's with Viol's:	No, All Evaluations
Evaluating Agencies:	None Chosen		
Evaluation Types:	None Chosen		
Violation Types:	None Chosen		
Sort Order:	Region, State, Handler Name		
Display Code Descrip.:	No		
Display Universes:	Yes		

Results

Data meeting the criteria you selected follows.

Total Pages: 6

Handler Count: 1

Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each Handler, including all orphan records. Below the Handler ID information, the data is presented in three sections; evaluations, violations and enforcements. Comments, referred to as Notes, are provided in each respective section. Since evaluations are included regardless of whether or not violations are identified, this report also serves as a useful management tool for tracking progress made towards meeting RECAP commitments.

Report Information

Name: cme_comprehensive.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed Date: November 2005
Last Updated: May 2010
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, hreport_univ5, ccitation3, hhandler4, lu_state, hid_groups
Libraries: none

Comprehensive Compliance Monitoring and Enforcement Report

Page 2

Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL

County Name / Code: COOK / IL031

ILD005421136

REGION 05

Location: 960 E 58TH ST; CHICAGO, IL 60637

Mailing: 5555 S ELLIS; CHICAGO, IL 60637

Activity Location: IL		State District:		Accessibility:		Non-Notifier:		Extract Flag: Y		Active Site: Y	
Generator:	LQG	Transporter:	N	Operating TSDF:	----	IC in Place:	N	El Indicator (HE / GW):	N / N		
Short-Term Gen:	N	Transfer Facility:	N	Offsite Receiver:	N	HSM:	N	Subpart K:	----		
Full Enforcement:	----	Converter:	----	State Unaddressed SNC:	N	EPA Unaddressed SNC:	N				
CA Wrkld:	N	State TSDF:	-----	State Addressed SNC:	N	EPA Addressed SNC:	N				
Active State Gen:	N			State SNC w/Comp Sched:	N	EPA SNC w/Comp Sched:	N				

CEI Evaluation 08/24/2009 Activity Location: IL By: EPA Identifier: 001 Person: DMS Suborganization: Found Violation: U
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: 08/24/2009 Focus Area:
 Eval. Notes: UNDETERMINED
 No Linked Violations

FRR Evaluation 08/31/2006 Activity Location: IL By: STATE Identifier: DV1 Person: RLM Suborganization: R2 Found Violation: NO
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: 08/31/2006 Focus Area:
 Eval. Notes: no violations cited
 No Linked Violations

CEI Evaluation 08/26/2004 Activity Location: IL By: EPA Identifier: 001 Person: TCB Suborganization: Found Violation: YES
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes:

Violation: Activity Location: IL Type: 262.C Determined Date: 08/26/2004 Determined by Agency: EPA Responsible Agency: EPA
 Scheduled Compliance Date: Actual Compliance Date: 12/01/2004 RTC Qualifier: DOCUMENTED Sequence Number: 2

Former Citation - SR - IAC 725.154(d)
 Viol. Notes: failure to update emergency coordinator list in contingency plan

Enforcement: Activity Location: IL Type: 120 Action Date: 10/26/2004 Identifier: 001
 Docket: Agency: EPA Responsible Person: TCB Branch:
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Violation: Activity Location: IL Type: 262.C Determined Date: 08/26/2004 Determined by Agency: EPA Responsible Agency: EPA
 Scheduled Compliance Date: Actual Compliance Date: 12/01/2004 RTC Qualifier: DOCUMENTED Sequence Number: 3

Former Citation - SR - IAC 725.152(d)
 Viol. Notes: failure to list home address of emergency coordinators in contingency plan

Enforcement: Activity Location: IL Type: 120 Action Date: 10/26/2004 Identifier: 001
 Docket: Agency: EPA Responsible Person: TCB Branch:
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Violation: Activity Location: IL Type: 262.C Determined Date: 08/26/2004 Determined by Agency: EPA Responsible Agency: EPA
 Scheduled Compliance Date: Actual Compliance Date: 12/01/2004 RTC Qualifier: DOCUMENTED Sequence Number: 4

Former Citation - SR - IAC 725.152(e)
 Viol. Notes: failure to list all emergency equipment in contingency plan

Enforcement: Activity Location: IL Type: 120 Action Date: 10/26/2004 Identifier: 001
 Docket: Agency: EPA Responsible Person: TCB Branch:
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Comprehensive Compliance Monitoring and Enforcement Report

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Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL, ILD005421136, CHICAGO, IL, continued -

Violation: Activity Location: IL	Type: 262.C	Determined Date: 08/26/2004	Determined by Agency: EPA	Responsible Agency: EPA
Scheduled Compliance Date:		Actual Compliance Date: 12/01/2004	RTC Qualifier: DOCUMENTED	Sequence Number: 5
Former Citation - SR - IAC 725.116(d)(1)				
Viol. Notes: failure to maintain record of employee names filling positions with haz. waste duties				
Enforcement: Activity Location: IL	Type: 120	Action Date: 10/26/2004	Identifier: 001	
Docket:	Agency: EPA	Responsible Person: TCB	Branch:	
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Violation: Activity Location: IL	Type: 262.C	Determined Date: 08/26/2004	Determined by Agency: EPA	Responsible Agency: EPA
Scheduled Compliance Date:		Actual Compliance Date: 12/01/2004	RTC Qualifier: DOCUMENTED	Sequence Number: 6
Former Citation - SR - IAC 722.134(c)(1)(B)				
Viol. Notes: failure to label satellite accum. containers				
Enforcement: Activity Location: IL	Type: 120	Action Date: 10/26/2004	Identifier: 001	
Docket:	Agency: EPA	Responsible Person: TCB	Branch:	
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Violation: Activity Location: IL	Type: 262.A	Determined Date: 08/26/2004	Determined by Agency: EPA	Responsible Agency: EPA
Scheduled Compliance Date:		Actual Compliance Date: 12/01/2004	RTC Qualifier: DOCUMENTED	Sequence Number: 7
Former Citation - SR - 703.121(a)(b)				
Viol. Notes: failure to have permit for storage of haz. waste w/o meeting exemption requirement				
Enforcement: Activity Location: IL	Type: 120	Action Date: 10/26/2004	Identifier: 001	
Docket:	Agency: EPA	Responsible Person: TCB	Branch:	
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Violation: Activity Location: IL	Type: 262.C	Determined Date: 08/26/2004	Determined by Agency: EPA	Responsible Agency: EPA
Scheduled Compliance Date:		Actual Compliance Date: 12/01/2004	RTC Qualifier: DOCUMENTED	Sequence Number: 8
Former Citation - SR - IAC 725.273(a)				
Viol. Notes: failure to close satellite accum. containers				
Enforcement: Activity Location: IL	Type: 120	Action Date: 10/26/2004	Identifier: 001	
Docket:	Agency: EPA	Responsible Person: TCB	Branch:	
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Violation: Activity Location: IL	Type: 262.B	Determined Date: 08/26/2004	Determined by Agency: EPA	Responsible Agency: EPA
Scheduled Compliance Date:		Actual Compliance Date: 12/01/2004	RTC Qualifier: DOCUMENTED	Sequence Number: 9
Former Citation - SR - IAC 722.123(a)				
Viol. Notes: failure to maintain copies of manifests				
Enforcement: Activity Location: IL	Type: 120	Action Date: 10/26/2004	Identifier: 001	
Docket:	Agency: EPA	Responsible Person: TCB	Branch:	
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:	

Comprehensive Compliance Monitoring and Enforcement Report

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Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL, ILD005421136, CHICAGO, IL, continued -

Violation: Activity Location: IL Type: 262.C Determined Date: 08/26/2004 Determined by Agency: EPA Responsible Agency: EPA
 Scheduled Compliance Date: Actual Compliance Date: 12/01/2004 RTC Qualifier: DOCUMENTED Sequence Number: 10
 Former Citation - SR - IAC 725.273(a)
 Viol. Notes: failure to close storage container of haz. waste

Enforcement: Activity Location: IL Type: 120 Action Date: 10/26/2004 Identifier: 001
 Docket: Agency: EPA Responsible Person: TCB Branch:
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Violation: Activity Location: IL Type: 262.C Determined Date: 08/26/2004 Determined by Agency: EPA Responsible Agency: EPA
 Scheduled Compliance Date: Actual Compliance Date: 12/01/2004 RTC Qualifier: DOCUMENTED Sequence Number: 11
 Former Citation - SR - IAC 722.1134(a)(3)
 Viol. Notes: failure to make accum. date on storage container visible for inspection

Enforcement: Activity Location: IL Type: 120 Action Date: 10/26/2004 Identifier: 001
 Docket: Agency: EPA Responsible Person: TCB Branch:
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

CEI Evaluation 10/29/2002 Activity Location: IL By: STATE Identifier: MD1 Person: AVO Suborganization: F2 Found Violation: NO
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes:
No Linked Violations

FRR Evaluation 06/10/2002 Activity Location: IL By: STATE Identifier: DV1 Person: GJY Suborganization: R2 Found Violation: NO
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes: No violations cited
No Linked Violations

FRR Evaluation 05/09/2002 Activity Location: IL By: STATE Identifier: DV1 Person: GJY Suborganization: R2 Found Violation: YES
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes:

Violation: Activity Location: IL Type: 264.H Determined Date: 05/09/2002 Determined by Agency: STATE Responsible Agency: STATE
 Scheduled Compliance Date: Actual Compliance Date: 06/12/2002 RTC Qualifier: DOCUMENTED Sequence Number: 4
 Former Citation - SR - 724.243
 Viol. Notes:

Enforcement: Activity Location: IL Type: 120 Action Date: 05/23/2002 Identifier: DV1
 Docket: Agency: STATE Responsible Person: GJY Branch: R2
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

CEI Evaluation 10/24/2002 Activity Location: IL By: STATE Identifier: MD1 Person: ILJH Suborganization: F2 Found Violation: NO
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes: no violations observed
No Linked Violations

Comprehensive Compliance Monitoring and Enforcement Report

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Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL, ILD005421136, CHICAGO, IL, continued -

CEI Evaluation	11/13/1998	Activity Location: IL	By: STATE	Identifier: PK1	Person: ILAV	Suborganization: F2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
FRR Evaluation	07/28/1998	Activity Location: IL	By: STATE	Identifier: DV1	Person: ILKB	Suborganization: R2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS CITED							
No Linked Violations							
FRR Evaluation	03/28/1997	Activity Location: IL	By: STATE	Identifier: DV1	Person: ILJM	Suborganization: R2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS CITED							
No Linked Violations							
CEI Evaluation	11/08/1996	Activity Location: IL	By: STATE	Identifier: GM1	Person: ILWW	Suborganization: F2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
CEI Evaluation	01/18/1995	Activity Location: IL	By: STATE	Identifier: LB1	Person: ILJH	Suborganization: F2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
FRR Evaluation	12/14/1994	Activity Location: IL	By: STATE	Identifier: DV1	Person: ILJM	Suborganization: R2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS CITED							
No Linked Violations							
CEI Evaluation	01/20/1993	Activity Location: IL	By: STATE	Identifier: SD1	Person: ILAV	Suborganization: F2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
FRR Evaluation	03/06/1992	Activity Location: IL	By: STATE	Identifier: DV1	Person: ILAV	Suborganization: R2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
NRR Evaluation	08/20/1991	Activity Location: IL	By: EPA	Identifier: 001	Person: R5BR	Suborganization: RE	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

Comprehensive Compliance Monitoring and Enforcement Report

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Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL, ILD005421136, CHICAGO, IL, continued -

Violation: Activity Location: IL	Type: 264.A	Determined Date: 08/20/1991	Determined by Agency: EPA	Responsible Agency: EPA					
Scheduled Compliance Date:		Actual Compliance Date: 11/23/1993	RTC Qualifier: DOCUMENTED	Sequence Number: 1					
Former Citation - FR - 270.72(a)(1)									
Enforcement: Activity Location: IL	Type: 310	Action Date: 11/14/1993	Identifier: 003						
Docket: V-W-92-R-024	Agency: EPA	Responsible Person:	Branch: E1						
<table border="1"><tr><td>Penalty Information:</td><td>Proposed:</td><td>Final Monetary: \$15,010</td><td>Collected: \$15,010</td><td>Total Final: \$15,010</td></tr></table>					Penalty Information:	Proposed:	Final Monetary: \$15,010	Collected: \$15,010	Total Final: \$15,010
Penalty Information:	Proposed:	Final Monetary: \$15,010	Collected: \$15,010	Total Final: \$15,010					
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:						
Enf. Notes: PAYMENT SENT									
Enforcement: Activity Location: IL	Type: 210	Action Date: 09/10/1992	Identifier: 002						
Docket: V-W-92-R-024	Agency: EPA	Responsible Person: R5BJR	Branch: E1						
<table border="1"><tr><td>Penalty Information:</td><td>Proposed: \$53,010</td><td>Final Monetary:</td><td>Collected:</td><td>Total Final:</td></tr></table>					Penalty Information:	Proposed: \$53,010	Final Monetary:	Collected:	Total Final:
Penalty Information:	Proposed: \$53,010	Final Monetary:	Collected:	Total Final:					
CA Component: N	Disposition Status:	Appeal Initiated:	Appeal Resolved:						
CEI Evaluation 01/25/1991	Activity Location: IL	By: STATE	Identifier: 003	Person: ILMG					
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Suborganization: F2					
Eval. Notes: NO VIOLATIONS OBSERVED			Day Zero:	Found Violation: NO					
No Linked Violations				Focus Area:					

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

Comprehensive Compliance Monitoring and Enforcement Report

Report run on: May 24, 2010 - 9:39 AM

Version: 5.0

User Selection Criteria

Location:	Illinois, all activities	Activity Location:	None Chosen
Handler ID:	ILD005421136	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	No Additional Restrictions		
Evaluation Date Range:	From Date: 10/01/1990 To Date: 05/24/2010		
Location County Code:	None Chosen	Extract Flag:	Include All Sites
Location City:		Evaluation Suborganization:	
Location Zip Code:		Evaluation Person:	
State District:		Evaluation Focus Area:	
Federal Facilities:	No, Show All	Only Eval's with Viol's:	No, All Evaluations
Evaluating Agencies:	None Chosen		
Evaluation Types:	None Chosen		
Violation Types:	None Chosen		
Sort Order:	Region, State, Handler Name		
Display Code Descrip.:	No		
Display Universes:	Yes		

Results

Data meeting the criteria you selected follows.

Total Pages: 6

Handler Count: 1

Report Description

This report provides a complete listing of evaluation, violation and enforcement activities for each Handler, including all orphan records. Below the Handler ID information, the data is presented in three sections; evaluations, violations and enforcements. Comments, referred to as Notes, are provided in each respective section. Since evaluations are included regardless of whether or not violations are identified, this report also serves as a useful management tool for tracking progress made towards meeting RECAP commitments.

Report Information

Name: cme_comprehensive.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed Date: November 2005
Last Updated: May 2010
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, hreport_univ5, ccitation3, hhandler4, lu_state, hid_groups
Libraries: none

Comprehensive Compliance Monitoring and Enforcement Report

Page 2

Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL

County Name / Code: COOK / IL031

ILD005421136

REGION 05

Location: 960 E 58TH ST; CHICAGO, IL 60637

Mailing: 5555 S ELLIS; CHICAGO, IL 60637

Activity Location: IL		State District:		Accessibility:		Non-Notifier:		Extract Flag: Y		Active Site: Y	
Generator:	LQG	Transporter:	N	Operating TSDF:	----	IC In Place:	N	EI Indicator (HE / GW):		N / N	
Short-Term Gen:	N	Transfer Facility:	N	Offsite Receiver:	N	HSM:	N	Subpart K:		----	
Full Enforcement:	----	Converter:	----	State Unaddressed SNC:	N	EPA Unaddressed SNC:	N				
CA Wrkld:	N	State TSDF:	-----	State Addressed SNC:	N	EPA Addressed SNC:	N				
Active State Gen:	N			State SNC w/Comp Sched:	N	EPA SNC w/Comp Sched:	N				

CEI Evaluation 08/24/2009 Activity Location: IL By: EPA Identifier: 001 Person: DMS Suborganization: Found Violation: U
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: 08/24/2009 Focus Area:
 Eval. Notes: UNDETERMINED
 No Linked Violations

FRR Evaluation 08/31/2006 Activity Location: IL By: STATE Identifier: DV1 Person: RLM Suborganization: R2 Found Violation: NO
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: 08/31/2006 Focus Area:
 Eval. Notes: no violations cited
 No Linked Violations

CEI Evaluation 08/26/2004 Activity Location: IL By: EPA Identifier: 001 Person: TCB Suborganization: Found Violation: YES
 Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
 Eval. Notes:

Violation: Activity Location: IL Type: 262.C Determined Date: 08/26/2004 Determined by Agency: EPA Responsible Agency: EPA
 Scheduled Compliance Date: Actual Compliance Date: 12/01/2004 RTC Qualifier: DOCUMENTED Sequence Number: 2

Former Citation - SR - IAC 725.154(d)
 Viol. Notes: failure to update emergency coordinator list in contingency plan

Enforcement: Activity Location: IL Type: 120 Action Date: 10/26/2004 Identifier: 001
 Docket: Agency: EPA Responsible Person: TCB Branch:
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Violation: Activity Location: IL Type: 262.C Determined Date: 08/26/2004 Determined by Agency: EPA Responsible Agency: EPA
 Scheduled Compliance Date: Actual Compliance Date: 12/01/2004 RTC Qualifier: DOCUMENTED Sequence Number: 3

Former Citation - SR - IAC 725.152(d)
 Viol. Notes: failure to list home address of emergency coordinators in contingency plan

Enforcement: Activity Location: IL Type: 120 Action Date: 10/26/2004 Identifier: 001
 Docket: Agency: EPA Responsible Person: TCB Branch:
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Violation: Activity Location: IL Type: 262.C Determined Date: 08/26/2004 Determined by Agency: EPA Responsible Agency: EPA
 Scheduled Compliance Date: Actual Compliance Date: 12/01/2004 RTC Qualifier: DOCUMENTED Sequence Number: 4

Former Citation - SR - IAC 725.152(e)
 Viol. Notes: failure to list all emergency equipment in contingency plan

Enforcement: Activity Location: IL Type: 120 Action Date: 10/26/2004 Identifier: 001
 Docket: Agency: EPA Responsible Person: TCB Branch:
 CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Comprehensive Compliance Monitoring and Enforcement Report

age 3

Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL, ILD005421136, CHICAGO, IL, continued -

Violation: Activity Location: IL Scheduled Compliance Date: Former Citation - SR - IAC 725.116(d)(1) Viol. Notes: failure to maintain record of employee names filling positions with haz. waste duties	Type: 262.C Docket: CA Component: N	Determined Date: 08/26/2004 Actual Compliance Date: 12/01/2004	Determined by Agency: EPA RTC Qualifier: DOCUMENTED	Responsible Agency: EPA Sequence Number: 5
Enforcement: Activity Location: IL Docket: CA Component: N	Type: 120 Agency: EPA Disposition Status:	Action Date: 10/26/2004 Responsible Person: TCB Appeal Initiated:	Identifier: 001 Branch: Appeal Resolved:	
Violation: Activity Location: IL Scheduled Compliance Date: Former Citation - SR - IAC 722.134(c)(1)(B) Viol. Notes: failure to label satellite accum. containers	Type: 262.C Docket: CA Component: N	Determined Date: 08/26/2004 Actual Compliance Date: 12/01/2004	Determined by Agency: EPA RTC Qualifier: DOCUMENTED	Responsible Agency: EPA Sequence Number: 6
Enforcement: Activity Location: IL Docket: CA Component: N	Type: 120 Agency: EPA Disposition Status:	Action Date: 10/26/2004 Responsible Person: TCB Appeal Initiated:	Identifier: 001 Branch: Appeal Resolved:	
Violation: Activity Location: IL Scheduled Compliance Date: Former Citation - SR - 703.121(a)(b) Viol. Notes: failure to have permit for storage of haz. waste w/o meeting exemption requirement	Type: 262.A Docket: CA Component: N	Determined Date: 08/26/2004 Actual Compliance Date: 12/01/2004	Determined by Agency: EPA RTC Qualifier: DOCUMENTED	Responsible Agency: EPA Sequence Number: 7
Enforcement: Activity Location: IL Docket: CA Component: N	Type: 120 Agency: EPA Disposition Status:	Action Date: 10/26/2004 Responsible Person: TCB Appeal Initiated:	Identifier: 001 Branch: Appeal Resolved:	
Violation: Activity Location: IL Scheduled Compliance Date: Former Citation - SR - IAC 725.273(a) Viol. Notes: failure to close satellite accum. containers	Type: 262.C Docket: CA Component: N	Determined Date: 08/26/2004 Actual Compliance Date: 12/01/2004	Determined by Agency: EPA RTC Qualifier: DOCUMENTED	Responsible Agency: EPA Sequence Number: 8
Enforcement: Activity Location: IL Docket: CA Component: N	Type: 120 Agency: EPA Disposition Status:	Action Date: 10/26/2004 Responsible Person: TCB Appeal Initiated:	Identifier: 001 Branch: Appeal Resolved:	
Violation: Activity Location: IL Scheduled Compliance Date: Former Citation - SR - IAC 722.123(a) Viol. Notes: failure to maintain copies of manifests	Type: 262.B Docket: CA Component: N	Determined Date: 08/26/2004 Actual Compliance Date: 12/01/2004	Determined by Agency: EPA RTC Qualifier: DOCUMENTED	Responsible Agency: EPA Sequence Number: 9
Enforcement: Activity Location: IL Docket: CA Component: N	Type: 120 Agency: EPA Disposition Status:	Action Date: 10/26/2004 Responsible Person: TCB Appeal Initiated:	Identifier: 001 Branch: Appeal Resolved:	

Comprehensive Compliance Monitoring and Enforcement Report

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Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL, ILD005421136, CHICAGO, IL, continued -

Violation: Activity Location: IL		Type: 262.C	Determined Date: 08/26/2004	Determined by Agency: EPA	Responsible Agency: EPA
Scheduled Compliance Date:			Actual Compliance Date: 12/01/2004	RTC Qualifier: DOCUMENTED	Sequence Number: 10
Former Citation - SR - IAC 725.273(a)					
Viol. Notes: failure to close storage container of haz. waste					
Enforcement: Activity Location: IL		Type: 120	Action Date: 10/26/2004	Identifier: 001	
Docket:		Agency: EPA	Responsible Person: TCB	Branch:	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	
Violation: Activity Location: IL		Type: 262.C	Determined Date: 08/26/2004	Determined by Agency: EPA	Responsible Agency: EPA
Scheduled Compliance Date:			Actual Compliance Date: 12/01/2004	RTC Qualifier: DOCUMENTED	Sequence Number: 11
Former Citation - SR - IAC 722.1134(a)(3)					
Viol. Notes: failure to make accum. date on storage container visible for inspection					
Enforcement: Activity Location: IL		Type: 120	Action Date: 10/26/2004	Identifier: 001	
Docket:		Agency: EPA	Responsible Person: TCB	Branch:	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	
CEI Evaluation 10/29/2002	Activity Location: IL	By: STATE	Identifier: MD1	Person: AVO	Suborganization: F2
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Found Violation: NO
Eval. Notes:					Focus Area:
No Linked Violations					
FRR Evaluation 06/10/2002	Activity Location: IL	By: STATE	Identifier: DV1	Person: GJY	Suborganization: R2
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Found Violation: NO
Eval. Notes: No violations cited					Focus Area:
No Linked Violations					
FRR Evaluation 05/09/2002	Activity Location: IL	By: STATE	Identifier: DV1	Person: GJY	Suborganization: R2
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Found Violation: YES
Eval. Notes:					Focus Area:
Violation: Activity Location: IL		Type: 264.H	Determined Date: 05/09/2002	Determined by Agency: STATE	Responsible Agency: STATE
Scheduled Compliance Date:			Actual Compliance Date: 06/12/2002	RTC Qualifier: DOCUMENTED	Sequence Number: 4
Former Citation - SR - 724.243					
Viol. Notes:					
Enforcement: Activity Location: IL		Type: 120	Action Date: 05/23/2002	Identifier: DV1	
Docket:		Agency: STATE	Responsible Person: GJY	Branch: R2	
CA Component: N		Disposition Status:	Appeal Initiated:	Appeal Resolved:	
CEI Evaluation 10/24/2000	Activity Location: IL	By: STATE	Identifier: MD1	Person: ILJH	Suborganization: F2
Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Found Violation: NO
Eval. Notes: no violations observed					Focus Area:
No Linked Violations					

Comprehensive Compliance Monitoring and Enforcement Report

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Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL, ILD005421136, CHICAGO, IL, continued -

CEI Evaluation	11/13/1998	Activity Location: IL	By: STATE	Identifier: PK1	Person: ILAV	Suborganization: F2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
FRR Evaluation	07/28/1998	Activity Location: IL	By: STATE	Identifier: DV1	Person: ILKB	Suborganization: R2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS CITED							
No Linked Violations							
FRR Evaluation	03/28/1997	Activity Location: IL	By: STATE	Identifier: DV1	Person: ILJM	Suborganization: R2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS CITED							
No Linked Violations							
CEI Evaluation	11/08/1996	Activity Location: IL	By: STATE	Identifier: GM1	Person: ILWW	Suborganization: F2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
CEI Evaluation	01/18/1995	Activity Location: IL	By: STATE	Identifier: LB1	Person: ILJH	Suborganization: F2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
FRR Evaluation	12/14/1994	Activity Location: IL	By: STATE	Identifier: DV1	Person: ILJM	Suborganization: R2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS CITED							
No Linked Violations							
CEI Evaluation	01/20/1993	Activity Location: IL	By: STATE	Identifier: SD1	Person: ILAV	Suborganization: F2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
FRR Evaluation	03/06/1992	Activity Location: IL	By: STATE	Identifier: DV1	Person: ILAV	Suborganization: R2	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED							
No Linked Violations							
NRR Evaluation	08/20/1991	Activity Location: IL	By: EPA	Identifier: 001	Person: R5BR	Suborganization: RE	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

Comprehensive Compliance Monitoring and Enforcement Report

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Report run on: May 24, 2010 - 9:39 AM

This report may contain enforcement sensitive data.

UNIVERSITY OF CHICAGO HOSPITAL, ILD005421136, CHICAGO, IL, continued -

Violation: Activity Location: IL Type: 264.A Determined Date: 08/20/1991 Determined by Agency: EPA Responsible Agency: EPA
Scheduled Compliance Date: Actual Compliance Date: 11/23/1993 RTC Qualifier: DOCUMENTED Sequence Number: 1
Former Citation - FR - 270.72(a)(1)

Enforcement: Activity Location: IL Type: 310 Action Date: 11/14/1993 Identifier: 003
Docket: V-W-92-R-024 Agency: EPA Responsible Person: Branch: E1

Penalty Information:	Proposed:	Final Monetary: \$15,010	Collected: \$15,010	Total Final: \$15,010
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CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

Enf. Notes: PAYMENT SENT

Enforcement: Activity Location: IL Type: 210 Action Date: 09/10/1992 Identifier: 002
Docket: V-W-92-R-024 Agency: EPA Responsible Person: R5BJR Branch: E1

Penalty Information:	Proposed: \$53,010	Final Monetary:	Collected:	Total Final:
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CA Component: N Disposition Status: Appeal Initiated: Appeal Resolved:

CEI Evaluation 01/25/1991 Activity Location: IL By: STATE Identifier: 003 Person: ILMG Suborganization: F2 Found Violation: NO
Citizen Complaint: NO Multimedia Inspection: NO Sampling: NO Not Subtitle C: NO Day Zero: Focus Area:
Eval. Notes: NO VIOLATIONS OBSERVED
No Linked Violations

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *



RE: Incorrect addresses at University of Chicago

Krista Cooley to: Diane Sharrow

Cc: Lorna Jereza, Kevin Chow

05/25/2010 08:18 AM

From: Krista Cooley <kcooley@uchicago.edu>
To: Diane Sharrow/R5/USEPA/US@EPA
Cc: Lorna Jereza/R5/USEPA/US@EPA, Kevin Chow/R5/USEPA/US@EPA
History: This message has been forwarded.

Thanks for following up and providing us the form, Ms. Sharrow. We will process this form immediately.

Sincerely,
Krista

-----Original Message-----

From: Sharrow.Diane@epamail.epa.gov [mailto:Sharrow.Diane@epamail.epa.gov]
Sent: Monday, May 24, 2010 4:45 PM
To: Krista Cooley
Cc: Sharrow.Diane@epamail.epa.gov; Jereza.Lorna@epamail.epa.gov;
Chow.Kevin@epamail.epa.gov
Subject: Incorrect addresses at University of Chicago

Ms. Cooley,

As I discussed with Ms. Jackson, Ms. Grover and you on May 13, 2010, attached is a copy of the Notification Form the University should complete to change the name and addresses associated with the Lab Services Bldg. from Univ of Chicago Hospital to Univ of Chicago, the facility address from 960 E. 58th St., to 6041 S. Blackstone, and the mailing address from 5555 S. Ellis to 6054 S. Drexel. If you have any questions, please contact me.

Thank you,

(See attached file: Notification Form 8700-12.pdf)

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Direct 312.886.6199
Facsimile 312.692.2906

Sharrow.Diane@epa.gov

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Protecting the environment is everyone's responsibility. Help USEPA fight pollution by reporting possible harmful environmental activity. To file a report, visit:
<http://www.epa.gov/compliance/complaints/index.html>

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Incorrect addresses at University of Chicago

Diane Sharrow to: kcooley

05/24/2010 04:44 PM

Cc: Diane Sharrow, Lorna Jereza, Kevin Chow

From: Diane Sharrow/R5/USEPA/US

To: kcooley@uchicago.edu

Cc: Diane Sharrow/R5/USEPA/US@EPA, Lorna Jereza/R5/USEPA/US@EPA, Kevin Chow/R5/USEPA/US@EPA

Ms. Cooley,

As I discussed with Ms. Jackson, Ms. Grover and you on May 13, 2010, attached is a copy of the Notification Form the University should complete to change the name and addresses associated with the Lab Services Bldg. from Univ of Chicago Hospital to Univ of Chicago, the facility address from 960 E. 58th St., to 6041 S. Blackstone, and the mailing address from 5555 S. Ellis to 6054 S. Drexel. If you have any questions, please contact me.

Thank you,



Notification Form 8700-12.pdf

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 05 2009

LR-8J

CERTIFIED MAIL 7001 0320 0005 8915 5626
RETURN RECEIPT REQUESTED

Mr. Steven Beaudoin
University of Chicago
5555 South Ellis Avenue
Chicago, Illinois 60637

Re: Request for Information

University of Chicago

✓ EPA ID. No.: ILD005421136

ILD005154778

ILR000114512

ILR000124008

ILR000124016

ILR000124024

ILR000129106

ILR000146787

ILR000143750

Dear Mr. Beaudoin:

By this letter, the U.S. Environmental Protection Agency (EPA) requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information. This request requires the University of Chicago and University of Chicago Hospital to submit certain information relating to the generation of hazardous wastes at its facilities located in Chicago, Illinois and referenced by EPA Identification Numbers above. We are requiring this information to determine the University of Chicago's and the University of Chicago Hospital's compliance status under Sections 3002 through 3006 of RCRA, 42 U.S.C. §§ 6922 through 6926, the regulations at 40 C.F.R. §§ 260-265 and under the requirements of the Illinois Administrative Code (IAC).

The enclosure specifies the information you must submit. You must submit this information within **30 CALENDAR DAYS** of receiving this request to the U.S. Environmental Protection Agency, at the following address:

Diane M. Sharrow
Land and Chemicals Division
RCRA Branch
Compliance Section 1
77 West Jackson Boulevard, LR-8J
Chicago, Illinois 60604

The information must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, under 40 CFR Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

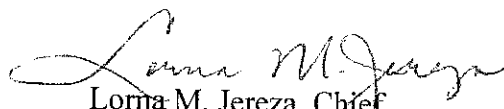
The University of Chicago and the University of Chicago Hospital must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject the University of Chicago and the University of Chicago Hospital to an enforcement action under Section 3008(a) of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Diane Sharrow, of my staff, at (312) 886-6199.

Sincerely,


Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency

REQUEST FOR INFORMATION

Instructions:

You must respond separately to each of the questions or requests in this attachment. Each of the following requests, and the terms, "University of Chicago", "University of Chicago Hospital", "the facility", or "you", relate or refer to any location at the University of Chicago where hazardous waste is generated.

Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

Definitions:

The following definitions have been taken from the Code of Federal Regulations, 40 CFR § 260.10.

1. "Person" means an individual, trust, firm, joint stock company, federal agency, corporation (including a government corporation), partnership, association, state, municipality, commission, political subdivision of a state, or any interstate body.
2. "Personnel" or "facility personnel" means all persons who work at or oversee the operations of a hazardous waste facility and whose actions or failure to act may result in noncompliance.
3. "RCRA" means the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC 6901 et seq.).

Requests:

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.
2. Provide a copy of all hazardous waste manifests from 2007 to present prepared for each of the following facilities, EPA Identification Numbers, and /or addresses:

ILD005421136 – 960 E. 58th St., Chicago, IL
ILD005154778 – 10910 S. Langley Ave., Chicago, IL
ILR000114512 – 5619 S. Cottage Grove Ave., Chicago, IL
ILR000124008 – 5540 S. Hyde Park Ave., Chicago, IL
ILR000124016 – 5445 Ingleside Ave., Chicago, IL
ILR000124024 – 5454 S. Shore Dr., Chicago, IL
ILR000129106 – 1027 E. 57th St., Chicago, IL

ILR000146787 – 1369 E. Hyde Park Ave., Chicago, IL
ILR000143750 – 5740 S. Woodlawn, Chicago, IL

900 E. 58th St., Chicago, IL
920 E. 58th St., Chicago, IL
5525 S. Ellis Ave., Chicago, IL
5555 S. Ellis Ave., Chicago, IL
5734 S. Ellis Ave., Chicago, IL
5735 S. Ellis Ave., Chicago, IL
5801 S. Ellis Ave., Chicago, IL
58th St. & Ellis Ave., Chicago, IL
57th St. & Ellis Ave., Chicago, IL
924 E. 57th St., Chicago, IL
5620 S. Stoney Island, Chicago, IL
60th & Blackstone Ave., Chicago, IL

3. Provide a narrative explanation of the following:

- a) the type(s) and amounts of hazardous waste generated at the University of Chicago, including the University of Chicago Hospital;
- b) where and how the hazardous waste generated at the University of Chicago, including the University of Chicago Hospital, is collected;
- c) how the hazardous waste generated at the University of Chicago, including the University of Chicago Hospital, is transported from point of generation to storage;
- d) who transports the hazardous waste generated at the University of Chicago, including the University of Chicago Hospital, from point of generation to storage; and,
- e) the location, address and telephone numbers of all hazardous waste storage locations at the University of Chicago, including the University of Chicago Hospital.

4. Provide a copy of the Contingency Plans or emergency procedures for all of the hazardous waste facilities listed in response to requests 1 through 3.

5. Provide a list of all facility personnel with hazardous waste management and contingency plan duties or responsibilities.

6. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date

Signature of Corporate Officer and Title



Land and Chemicals Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☒ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action
☐ _____

Facility Name: University of Chicago
Facility Location: 5555 S. Ellis Ave.
City: Chicago State: IL Zip: 60637
U.S. EPA I.D. No.: ILD 005 421 136
Assigned Staff: D. Sharrow Phone: 616199

Name	Signature	Date
Author	<i>Sharrow</i>	9/25/09
Regional Counsel	<i>K. Chow</i>	9-28-09
Section Chief	<i>Jerena</i>	10/5/09
Branch Chief	N/A	N/A

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make copies of the contents of this folder:
 - One copy for the assigned staff who will file the official file copy;
 - One copy for the section file;
3. **Make any additional copies for ORC person specified below and the cc's or bcc's:**
K. Chow-14J
4. Mail the original certified mail and distribute office copies and cc's and bcc's;
5. Return the certified mail receipt (green card), with this sign-off sheet assigned staff;
6. E-mail staff the date that the letter was received by facility.



RE: University of Chicago Hospital

Davison, Mike to: Diane Sharrow

08/24/2009 04:40 PM

Cc: "Marvel, Todd"

Diane,

Point of Contact was Steve Beaudoin as of March 1, 2008. No information in the file about current location of 90 day storage area.

Mike

From: Sharrow.Diane@epamail.epa.gov [mailto:Sharrow.Diane@epamail.epa.gov]

Sent: Monday, August 24, 2009 3:45 PM

To: Davison, Mike; todd.marvel@epa.gov

Subject: Fw: University of Chicago Hospital

-----Forwarded by Diane Sharrow/R5/USEPA/US on 08/24/2009 03:45PM -----

To: davison.mike@illinois.gov, marvel.todd@illinois.gov

From: Diane Sharrow/R5/USEPA/US

Date: 08/24/2009 03:32PM

Subject: University of Chicago Hospital

Todd and / or Mike,

I will be conducting an unannounced CEI at the U of C Hospital in Chicago, IL.

It was last inspected by USEPA about 5 1/2 years ago.

Based on our hard-copy records U of C Hospital was in the process of tearing down / relocating their storage facility.

Does Ill EPA have any new info via closure, notification, annual report, etc., on the new location and point of contact info?

Thanks,

Diane M. Sharrow
Environmental Scientist/Senior Inspector
USEPA, Region 5, Land and Chemicals Division
RCRA Branch, Compliance Section 1
Mail Code LR-8J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Direct 312.886.6199
Facsimile 312.692.2906

Sharrow.Diane@epa.gov

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U of C Closure Letter.pdf U of C 2007 Annual Report Certification.pdf



The University Of Chicago
Risk Management, Audit and Safety.
Environmental Health and Safety
6054 S. Drexel Avenue, Chicago, Illinois 60637

Krista Cooley
Associate Director, Environmental Health and Safety

Phone: (773) 702-9999
Fax: (773) 702-6546
email: kcooley@uchicago.edu

July 22, 2009

Re: Notice of Violations, Dated June 15, 2010
EPA I.D. No.: ILD 005 421 136

Dear Ms. Sharrow:

The attached report contains requested responses to the violations and proof of exemption of the requirement to obtain a hazardous waste treatment, storage or disposal permit by the U.S. Environmental Protection Agency (EPA) under 35§ 722.134(a) and (c) [40 CFR § 262.34(a) and (c)].

The following provides responses to violations 1 through 6 by the U.S. EPA under 35§ 722.134(a) and (c) [40 CFR § 262.34(a) and (c)].

1. A generator of greater than 1,000 kilograms of hazardous waste in a calendar month who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the hazardous waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste, and must submit an Exception Report if the generator has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter. See 35 IAC §§ 722.142(a)(1) and (a)(2) [40 CFR § 262.42(a)(1) and (a)(2)]. At the time of the EPA's May 13, 2010 inspection, The University of Chicago could not locate copies of all manifests with the handwritten signature of the owner or operator of the designated facility to determine the status of the hazardous waste, and submittals of any Exception Reports when it did not receive a copy of the manifest with the handwritten signatures of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter.

The University of Chicago does obtain and keep manifest as required by law, but we were simply unable to produce the hazardous waste manifest from November 1, 2009 to April 19, 2010 when requested during the inspection because they were not located in a readily available file. All waste manifests will be electronically filed as soon as they are received from the operator of

the designated facility. Please see enclosed CD with waste manifest from November 1, 2009 to April 19, 2010 bookmarked by month.

2. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must ensure that the facility personnel complete a program of classroom instruction or on-the job training that teaches them to perform their duties in a way that ensures the facility's compliance with applicable hazardous waste storage facility performance standards and that they review such training annually. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (*including contingency plan implementation*) relevant to the positions in which they are employed. See 35 IAC § 722.134 (a) (4) and 752.166 (a)-(e) [40 CFR§262.34 (a)(4) and 265.16 (a)(1)-(3), (b)(1)-(4) and (e)]. At the time of the inspection, The University of Chicago had not ensured that the facility contract personnel, including contract staff from Wilpen Environmental Services, Incorporated, had completed a program of classroom instruction or on-the-job training that taught them to perform their duties in a way that ensures the facility's compliance with applicable hazardous waste storage facility performance standards, that they had reviewed such training annually, that the program was directed by a person trained in hazardous waste management procedures, and that the instruction had taught facility personnel hazardous waste management procedures (*including contingency plan implementation,*) relevant to the positions in which they are employed.

The University of Chicago's Environmental Health and Safety Office has obtained the RCRA training log from Wilpen Environmental Services, Inc. for all personnel that work within the University of Chicago's hazardous waste storage facility, along with their certificates of RCRA training, the course training syllabus and site specific Contingency Plan. Please see Attachment A for all training documentation for the University of Chicago's hazardous waste contractor, Wilpen Environmental Services, Inc.

3. A large quantity generator of hazardous waste must also maintain the job title for each position at the facility related to hazardous waste management, the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and former employees. See 35 IAC § 722.134(a) (4) and 725.116 (a)-(e) [40 CFR § 262.34 (a)(4) and 265.16 (a)(1)-(3), (b), (c), (d)(1)-(4) and (e)]. At the time of the inspection, The University of Chicago had not ensured that the job title for each position at the facility (specifically, for the contract employees from Wilpen Environmental Services, Incorporated), related to hazardous waste management, including the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and former employees were maintained.

Wilpen Environmental Services, Inc. has maintained their employee's job titles, job descriptions and training documentation pertaining to hazardous waste management, but will now also be maintained by the University of Chicago's Environmental Health and Safety Office. The University of Chicago's Environmental Health and Safety Office will also continue to maintain all internal staff member's job descriptions and training documents related to hazardous waste management. Please see Attachment A for Wilpen Environmental Services, Inc. aforementioned documentation, Attachment B for the University of Chicago's Environmental Health and Safety Office aforementioned information and Attachment C for the University of Chicago's site specific Contingency Plan.

4. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must maintain a copy of the contingency plan at the facility. See 35 IAC§ 722.134 (a) (4) and 725.153 (a) [40 CFR 262.34 (a) (4) and 265.53 (a)]. At the time of the inspection, a copy of The University of Chicago's Laboratory Service Building October 23, 2009 Contingency Plan was not maintained at 6041 South Blackstone Avenue, Chicago, Illinois 60637.

The University of Chicago's Environmental Health and Safety Office has placed an updated copy of the Contingency Plan within the hazardous waste storage facility and inside the Fire Department Information Center box at the entrance of the hazardous waste facility. Please see Attachment C for the updated Contingency Plan.

5. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must review and revise the facility contingency plan when the facility changes in a way that modifies the emergency response necessary, when information regarding the emergency coordinators changes, or when equipment changes. See 35 IAC § 722.134 (a) (4) and 725.154 (c), (d) and (e) [40 CFR§ 262.34 (a) (4) and 265.54 (c), (d) and (e)]. At the time of the inspection, The University of Chicago's Laboratory Services Building October 23, 2009 Contingency Plan, had not been updated to reflect changes in the address (which should have been correctly and consistently identified 6041 rather than 6049 South Blackstone Avenue), the capability of the emergency equipment (contents of the spill kit), and the location of emergency equipment (spill kit should have been located inside rather than outside the facility).

The University of Chicago's Laboratory Service Building Contingency Plan has been updated to reflect the correct address (6041 S. Blackstone Avenue) and the location and contents of the chemical spill kit. Please see Attachment C for a copy of the updated Contingency Plan and the RCRA Site ID Form 8700-12 which was submitted to Illinois Environmental Protection Agency on July 7, 2010 to correct the facility address with the state.

6. A large quantity generator of hazardous waste which accumulates hazardous waste onsite for 90 days or less, and which does not meet the conditions for a hazardous waste permit exemption of 35 IAC § 722.134 (a) [40 CFR § 262.34

(a)], is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See 35 IAC § 703.121 (a) and (b), 703.180 (c) and 705.121 (a) [40 CFR § 270.1 (c), 270.10 (a) and (d)]. By virtue of its failure to comply with the exception reporting, training, and contingency plan requirements for a hazardous waste permit exemption, the University of Chicago became the owner or operator of a hazardous waste treatment, storage or disposal facility. The University of Chicago failed to apply for and obtain a hazardous waste storage permit, and The University of Chicago's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC § 703.121 (a) and (b), 703.180 (c) and 705.121 (a) [40 CFR § 270.1 (c), 270.10 (a) and (d)].

The University of Chicago has made all the corrective actions stated above to be exempt from applying for a hazardous waste permit under 35 IAC § 722.134 (a) [40 CFR § 262.34 (a)].

Sincerely,

A handwritten signature in cursive script that reads "Krista Cooley". The signature is written in dark ink and is positioned above the printed name.

Krista Cooley

Attachment A

Attachment A includes the following for Wilpen Environmental Services, Inc.:

- RCRA Training Logs;
- Instructor's Names for the RCRA Training Course;
- RCRA Training Syllabus;
- Site Specific Contingency Plan; and
- Employee's RCRA Training Certification.

RCRA TRAINING LOG

NAME	JOB TITLE	TRAINING DATE	TRAINING MATERIALS
ALTENBACH, JOHN	LPT	8 SEP 2009	Syllabus, RCRA PowerPoint Presentation, RCRA Orientation Manual, 40 CFR, "A Method for Determining the Compatibility of Hazardous Wastes" by H.K. Hatayama, et al., Wilpen's Contingency Plan, other handouts, reference books and videos, and site specific training. A Certificate of Completion is awarded when a 70% or better is accomplished on a knowledge test.
ESPOSITO, RALPH	LPT	8 SEP 2009	
SAPIENZA, JOSEPH	LPS	8 SEP 2009	
WILK, MICHAEL	LPS	8 SEP 2009	

JOB DESCRIPTIONS:

LAB PACK SUPERVISOR (LPS): Responsible for collecting and packaging chemicals for proper disposal. This position requires a minimum of 10 years of experience and a college bachelor's degree in science.

LAB PACK TECHNICIAN (LPT): A supervised helper to a LAB PACK SUPERVISOR. No prerequisite education level or experience required.

FREQUENCY:

ANNUALLY (OR SOONER AS NEW REGULATIONS OR SAFETY ISSUES BECOME RECOGNIZED)

TRAINING WILL OCCUR IN ITS ENTIRETY EACH YEAR.

Joseph Sapienza and Michael Wilk are the co-trainers of Wilpen Environmental Services, Inc's RCRA Training. They each have more than 20 years of experience in hazardous waste management procedures.

RCRA Training Syllabus

Date Revised: August 29, 2009

Time Required: 4 Hours

Overview: Objectives and Course Content below and... New employees will also receive, at a minimum, 3 months of on the job training. This training will include on-site training and be conducted annually, in its entirety, with a test to assess competency (at least 70% passing), and a certificate will be issued upon successful completion of this course.

Objectives:

1. Be able to identify a solid waste.
2. Be able to identify a hazardous waste.
2. Be able to identify a listed and characteristic waste.
3. Understand the compatibilities and segregation of chemicals.
4. Be able to recognize the three classes of generators.
5. Understand Satellite Accumulation Areas
3. Understand how to safely handle and manage chemicals.
4. Understand the anatomy of a lab pack.
5. Understand the anatomy of and how and when to overpack a drum.
7. Know the properties of and how to implement a Contingency Plan and how (including alarms and communication), and when, to respond to a chemical spill. Also includes training on responding to fires and explosions.
8. Understand the importance of personal hygiene and housekeeping procedures.

Materials: RCRA POWERPOINT PRESENTATION, RCRA ORIENTATION GUIDE, 40 CFR, Contingency Plan, "A Method for Determining the Compatibility of Hazardous Wastes" by H. K. Hatayama, et al., and other appropriate videos, handouts and reference books and site specific training.

Training Outline: (**CAPITAL BOLD** sections are not covered in PowerPoint presentation, but are covered by other presentations)

1. RCRA Defined
2. RCRA Chemical Identification
 - a. Solid waste defined
 - b. Excluded Wastes
 - c. Universal Wastes
 - d. Hazardous waste defined
 - e. RCRA empty containers
 - f. Characteristic waste
 - g. Listed waste
3. **A METHOD FOR DETERMINING THE COMPATIBILITY OF HAZARDOUS WASTES**
 - a. Segregation and Compatibility defined.
 - b. Chemicals and Hazard Classes
 - c. Hazardous waste compatibility chart
 - d. Reactivity Groups
 - e. Compatibility of outer containers and packing material.
4. **SAFE CHEMICAL HANDLING**
 - a. **Defined** – ALWAYS SAFETY FIRST
 - b. **PPE and its limitations**
 - c. **Demonstration** – Always Lift/Carry and Pack containers in the safest way. Place hand under and also on top.
 - d. **Common sense** – Think slow and careful. Do not collect containers that do not have caps or are broken or look nasty or they may break in transit.
 - e. **Good housekeeping** keeps you from having accidents.

5. **CHEMICAL IDENTIFICATION AND HAZARD RECOGNITION**

- a. Chemical Labeling
- b. Material Safety and Data Sheets (MSDSs)
- c. Hazardous Material Identification System (HMIS)
- d. Generator Knowledge
- e. Lewis' Hazardous Chemicals Desk Reference
- f. Other Markings
- g. Other informational resources and the internet.

6. Generator Status

- a) LQG
- b) SQG
- c) CESQG

7. Contingency Plan to Emergencies and Chemical Spills

- a) Incidental Spills
- b) Unintentional Hazardous Release
- c) Wilpen's Contingency Plan And Responsibilities
- d) Wilpen's Posted Site Contingency Plan
- e) **HOW TO USE AND IMPLEMENT ALARMS AND COMMUNICATIONS**
- f) **RESPONSES TO FIRES AND/OR EXPLOSIONS**
- g) **THE EMERGENCY RESPONSE GUIDE**
- h) Reporting to LQG
- i) Always Safety First

8. SAAs (Satellite Accumulation Area) Requirements

9. The Anatomy of a Lab Pack

11. **FIRST AID BASICS**

10. **CHEMICAL HYGIENE AND HOUSEKEEPING**

11. **CONCLUSION**

POSTED SITE SPECIFIC CONTINGENCY PLAN

EMERGENCY COORDINATORS

STEVE BEAUDOIN
DIR OF ENV HEALTH & SAFETY
115 DENELL DRIVE
CRETE, IL 60417
Office: 773-702-9999
Home: 708-672-6975

KRISTA COOLEY
ASSC DIR OF ENV HEALTH & SAFETY
79 OAK TREE DRIVE
VALPARAISO, IN 46383
Office: 773-702-9999
Home: 219-462-8592

LOCATION

UNIVERSITY OF CHICAGO LAB SERVICES BUILDING
(6041 S BLACKSTONE)

CHEMIST(S) AND/OR OTHER(S)

AT THE WORK SITE

MIKE WILK AND/OR JOE SAPIENZA AND/OR RALPH ESPOSITO
AND/OR ALTENBACH

NEAREST HOSPITAL (INCLUDE PHONE NUMBERS)

U OF C HOSPITAL (773) 702-6250 EMERGENCY ROOM

MOST DIRECT ROUTE TO HOSPITAL:

61ST WEST TO COTTAGE GROVE NORTH TO 58TH EAST

LOCATION OF THE NEAREST:

WATER SUPPLY (include shower and eye wash if available)

MAIN ROOM OF BLOCKHOUSE

FIRE EXTINGUISHER

MAIN ROOM OF BLOCKHOUSE

EXITS AND TELEPHONE

MAIN ROOM OF BLOCKHOUSE

IMPORTANT TELEPHONE NUMBERS

FIRE AND POLICE DEPARTMENT	911
CHEMTREC	1-800-424-9300
NATIONAL RESPONSE CENTER	1-800-424-8802
POISON CONTROL CENTER	1-800-942-5969
PESTICIDE HOTLINE	1-202-366-4488

HAVE THE FOLLOWING INFORMATION READY:

- 1) Your name and call back number.
- 2) Name of the generator.
- 3) Nature, time and location of incident.
- 4) Material released and any identifying information.
- 5) Any associated mechanical or physical hazards.
- 6) Any other pertinent information.

CHEMIST(S) AND OTHER(S) AT THE WORKSITE WILL PARTAKE IN A 5 MINUTE BREAK FOR EVERY 60 MINUTES WORKED. THE LENGTH OF THIS BREAK WILL BE INCREASED TO REFLECT MORE DIFFICULT WORKING CONDITIONS AND OTHER STRESSING FACTORS AT THIS WORKSITE.

CONTINGENCY PLAN

PURPOSE:

To prevent and minimize the harm or the potential harm to human life and the environment in the event of an unintentional hazardous discharge.

EMERGENCY PROCEDURES TO AN UNINTENTIONAL HAZARDOUS DISCHARGE:

A PRECAUTIONARY DISTANCE

Remain a safe distance away until a complete assessment of the hazards has been established. Safety and caution are a must: Use any informational gathering hardware that will allow you to keep a protected distance away (including binoculars and two-way communication systems) in order to evaluate the ambient hazards.

SECURE THE SCENE

Isolate the area. Keep unauthorized people as far away from the scene as possible and, specifically, outside of the isolation perimeter.

IDENTIFY THE HAZARDS

Identify the hazards using any and all available information. Sources of available information include, but are not limited to, chemical dictionaries, placards, manifests, hazardous waste labels, packing lists, material safety and data sheets (MSDS's), the Emergency Response Book, knowledgeable persons, and the following agencies:

CHEMTREC	1-800-424-9300
NATIONAL RESPONSE CENTER	1-800-424-8802
POISON CONTROL CENTER	1-800-942-5969
PESTICIDE HOTLINE	1-202-366-4488

CONTAIN THE HAZARD

Evaluate ALL of the potential hazards. And only if it is safe AND only if appropriate personal protective equipment allows you to do so safely, prevent or minimize the spreading of the hazard by creating containment bulwarks and/or implementing cleaning and procurement procedures (It is important to keep in mind to use gear that is compatible, doesn't react adversely, with the hazard causing material or its byproducts thereof). Examples of spreading minimization would be blocking sewer drain so that the hazard causing material could not enter the public water system; absorbing the hazard causing material with a compatible absorbent; and placing, shoveling, pumping, or bailing the hazardous material into a compatible container. NEVER attempt containment, cleaning, and/or procurement if there are inordinate risks or unknowns are involved.

OBTAIN HELP FROM APPLICABLE AGENCIES

CHEMTREC	1-800-424-9300
NATIONAL RESPONSE CENTER	1-800-424-8802
POISON CONTROL CENTER	1-800-942-5969
PESTICIDE HOTLINE	1-202-366-4488

Use the agencies (and telephone numbers) mentioned above, and any and all other applicable agencies, which could include, but not be limited to, nearby hospitals, the local hazardous response team, the fire department, and the police department.

AND BE READY WITH THE FOLLOWING INFORMATION

- 1) Caller name and call back telephone number.
- 2) Name of responsible party (Generator).
- 3) Nature, time, and location of the incident.
- 4) Material released and any other identifying information.
- 5) Any associated mechanical or physical hazards.
- 6) Any other pertinent information.

CONCLUSION:

REMEMBER

- 1) Proceed with caution and due care.
- 2) Do not rush in. A worst case scenario is that someone is unconscious in the incidental area and you want to help. Realize that you are extraordinarily vulnerable to becoming a victim too. A majority of the rescuers rush in haphazardly and die. Avoid inhaling, touching, or coming into direct or indirect proximity of the hazardous material or its byproducts. Stay upwind, if possible, and remain a prudent distance away.
- 3) Secure the scene.
- 4) Obtain any and all pertinent information of the hazard.
- 5) Acquire help from support agencies.
- 6) Delegate the above duties to responsible individuals in order to achieve the safe site.



WILPEN ENVIRONMENTAL SERVICES, INC

RCRA ORIENTATION TRAINING

This certificate is awarded to

JOHN ALTENBACH

in recognition of successfully completing the
RCRA ORIENTATION TRAINING
and passing a test with a score of 70% or greater.

September 8, 2009

Date of Completion



WILPEN ENVIRONMENTAL SERVICES, INC

RCRA ORIENTATION TRAINING

This certificate is awarded to

RALPH ESPOSITO

in recognition of successfully completing the

RCRA ORIENTATION TRAINING

and passing a test with a score of 70% or greater.

September 8, 2009

Date of Completion



WILPEN ENVIRONMENTAL SERVICES, INC

RCRA ORIENTATION TRAINING

This certificate is awarded to

JOSEPH SAPIENZA

in recognition of successfully completing the

RCRA ORIENTATION TRAINING

and passing a test with a score of 70% or greater.

September 8, 2009

Date of Completion

WILPEN ENVIRONMENTAL SERVICES, INC

RCRA ORIENTATION TRAINING

This certificate is awarded to

MICHAEL WILK

in recognition of successfully completing the

RCRA ORIENTATION TRAINING

and passing a test with a score of 70% or greater.

September 8, 2009

Date of Completion

Attachment B

Attachment B includes the following for the University of Chicago's Environmental Health and Safety Office:

- Certificates of Hazardous Materials Training;
- Hazardous Materials Training Syllabus; and
- Hazardous Waste Facility (Laboratory Service Building) Contingency Plan Training Attendance Log.



HON. KEN REILLY'S ENVIRONMENTAL COMPLIANCE SEMINAR

THIS CERTIFIES THAT Steven Beaudoin

**Has enrolled in and Completed
The Emergency Coordinator and
Hazardous Waste Management Compliance Seminar**

This Certificate represents a sincere effort on their company's behalf and on their own behalf to comply with the Environmental Protection Agency Hazardous Waste Regulations.

AWARDED MARCH 11, 2010



Ken Reilly

Safety Training Services, Inc.

Certificate of Completion

This Certificate is Awarded to

Steven Beaudoin



Who Has Satisfactorily Completed the

8 Hr. 29CFR1910.120 Hazardous Materials Refresher Training

on

May 13, 2010

Robert J. Smith Jr.

Training Center Manager



Steven Beaudoin

Program Coordinator

Transportation Skills Programs, Inc.

Certificate of Training

Krista Cooley

This Certifies That _____

has successfully completed the

USP Hazardous Materials & Waste Management and Compliance Seminar

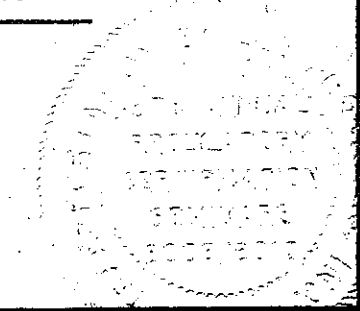
in a sincere effort to comply with the mandatory and annual training and testing requirements of
the U.S. Department of Transportation (49 CFR 172.704),
the Environmental Protection Agency (40 CFR 262.34(a)(4) & 265.16),
or the Occupational Safety and Health Administration (29 CFR 1910.120(q)(6)(i)).

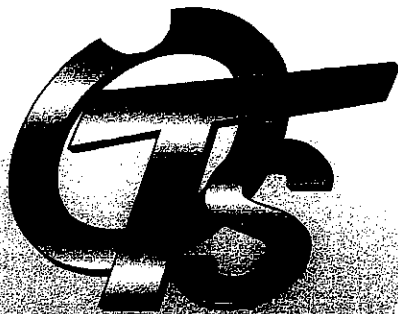
In Witness Whereof, this certificate is signed and sealed on this date Dec 9, 2009



Transportation Skills Programs, Inc.
243 West Main Street • P.O. Box 308
Kutztown, PA 19530-0308
610 683-7853

Robert J. Keegan, President





Occupational Training & Supply, Inc.

7233 Adams Street ♦ Willowbrook, IL 60527 ♦ (630) 655-3900

Krista Cooley

has successfully completed the 8 hour Hazardous Waste Site Refresher course and has passed the competency exam in accordance with OSHA 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response.

Hazardous Materials Refresher

Course Date: 5/14/2010

Expiration Date: 5/14/2011

Exam Date: 5/14/2010

Certificate: HMR1005141315


Kathy DeSalvo, Director

2010

Safety Training Services, Inc.

Certificate of Completion

This Certificate is Awarded to

Melissa Jackson



Who Has Satisfactorily Completed the

8-Hr. 29CFR1910.120 Hazardous Materials Refresher Training

on

June 15, 2010

Robert J. Smith Jr.

Training Center Manager

Steve L. Smith

Program Coordinator





Occupational Training & Supply, Inc.

7233 Adams Street ♦ Willowbrook, IL 60527 ♦ (630) 655-3900

Sarah Grover

has successfully completed the 8 hour Hazardous Waste Site Refresher course and has passed the competency exam in accordance with OSHA 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response.

Hazardous Materials Refresher

Course Date: 7/17/2009
Expiration Date: 7/17/2010

Exam Date: 7/17/2009
Certificate: HMR0907171876


Kathy DeSalvo, Director

2009



Occupational Training & Supply, Inc. Management Audit | 7/12/2010

Occupational Training & Supply, Inc.

7233 Adams Street ♦ Willowbrook, IL 60527 ♦ (630) 655-3900

Kevin Rohrer

has successfully completed the 8 hour Hazardous Waste Site Refresher course and has passed the competency exam in accordance with OSHA 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response.

Hazardous Materials Refresher

Course Date: 8/14/2009

Expiration Date: 8/14/2010

Exam Date: 8/14/2009

Certificate: HMR0908141990


Kathy DeSalvo, Director

2009

Safety Training Services, Inc.

Certificate of Completion

This Certificate is Awarded to

Christopher Harvey



Who Has Satisfactorily Completed the

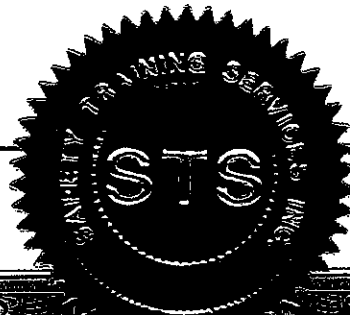
8-Hr. 29CFR1910.120 Hazardous Materials Refresher Training

on

May 24, 2010

Robert J. Smith Jr.

Training Center Manager



Stephen L. Smith

Program Coordinator

Safety Training Services, Inc.

Certificate of Completion

This Certificate is Awarded to

Paula Dillon



Who Has Satisfactorily Completed the

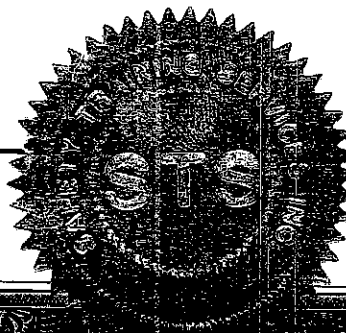
8-Hr. 29CFR1910.120 Hazardous Materials Refresher Training

on

August 21, 2009

Robert J. Dunn Jr.

Training Center Manager



[Signature]

Program Coordinator

NATIONAL FIRE ACADEMY

THIS CERTIFIES THAT

Thomas L. Hosack

has successfully completed to satisfaction the following course

HAZMAT TECHNICIAN LEVEL REFRESHER

Conducted April 2, 2010



A handwritten signature in cursive script, reading "Donald Dodd", is written over a horizontal line.

Donald Dodd
Instructor

Safety Training Services, Inc.

Certificate of Completion

This Certificate is Awarded to

Hugo Rodriguez



Who Has Satisfactorily Completed the

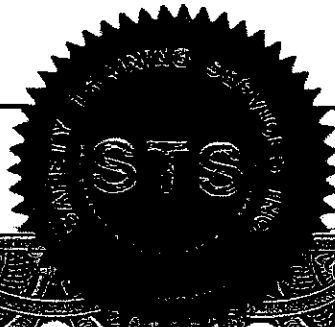
40-Hr. 29CFR1910.120 Hazardous Materials Training

on

July 16, 2010

Robert J. Smith Jr.

Training Center Manager



Steve Smith

Program Coordinator

RCRA Compliance Training

Public Seminar Schedule Registration

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**REGISTER
ONLINE
TODAY!**

**RCRA
Seminar**



**Click here
for a
printable
brochure.**

HON. KEN REILLY **RCRA Compliance Training**

RCRA training focuses on the Duties of the Emergency Coordinator and the Management of Hazardous Waste as required in the RCRA regulations.

The RCRA Seminar Will Train You On:

Characteristics of Hazardous Waste
Methods of Disposal
Cradle to Grave Liability
Handling Leaks, Spills and Empties
Training Your Co-Workers
Emergency Coordinator Responsibilities
Manager of HazWaste Responsibilities
How to Properly Complete the new EPA Manifests
Civil and Criminal Penalties (They've been increased)
Waste Minimization



Seminar Begins: 9:00 AM

Introducing RCRA By Reilly

RCRA On-Line Training by Hon. Ken Reilly, J.D.

For Your Convenience:
Register On-Line
Need More Information?
E-Mail the Registrar
or Call at 800-727-9212

RCRA Annual Training made Quick and Easy and It's Online!

YOUR TRAINING INCLUDES:

Features:

Meets RCRA 40 CFR 242 training requirements for both Large (LQG) and Small (SQG) Quantity generators.

Benefits:

- Fast: (can be completed in as little as 2 hours)

- Complete Topics Include:

1. The Law
2. EPA – The Beginning
3. Cradle to Grave Liability
4. The States
5. The Environmental Liaison

Certificates Will Be Awarded: 4:30 PM



"Really helped me through the recent downturn!
Thanks, Ken."

This seminar is designed to meet both your
State and Federal requirements for training.
Failure to complete required training is
a fineable violation.

As most readers already know, HazWaste compliance is a requirement at both the federal and state level. Too often there exists the mistaken belief that "Regulations" are either not laws or less important than "Statutory" laws. So let's take a brief visit to the "Courtroom". Most citizens are aware that the power of a Judge to "punish" for a statutory violation includes "Contempt", "Fine", "Injunction" (both preventative and mandatory), and in severe cases, "Incarceration". Did you know that each of the above judicial options is also available to any Judge hearing a "Complaint" regarding violation of a state or federal regulation? And, by the way, while the regulations governing Large Quantity Generators are a bit more severe than those governing Small Quantity Generators, nevertheless each category has the same exposure to lawful compliance obligations.

Perhaps the most frequently asked question of this "Trainer" is... "Where does it say that I have to take this Annual Training?" The answer is confusing even to some attorneys; but, can best be summarized as follows: a close reading of 40 CFR 262.34(a)(4), a part of the regulations which appears to deal only with "Accumulation Time", discloses the method by which a generator is allowed to avoid the need to obtain a "Permit" for the storage of hazardous waste. That "reg" defines the method as compliance with 40 CFR 265.16, which is the actual statement of the Annual Training Requirement. Yes, it is true that this part of the regulations was originally intended to govern the training requirements of HazWaste disposal facility personnel, but it was made applicable to LQGs and SQGs by the clever language added at the end of 40 CFR 262.34(a)(4). So next time your "Management" questions your need for training, just show them this brief summary.

Have YOU Fulfilled YOUR Annual RCRA Training Requirement?

6. RCRA Training Specifics
7. RCRA Reporting
8. Waste Management and Minimization
9. Emergency Response
10. The Weekly Inspection
11. The Shipping Manifest
12. Transportation and Disposal
13. The Audit
14. Civil and Criminal Liability

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1. No absence from work
2. Modular format (allows work at individual pace)
3. Comprehensive workbook provided
4. Frame ready Certificate of Completion

Trainer:

Hon. Ken Reilly is uniquely qualified to conduct the training required by the Code of Federal Regulations. A regulatory lawyer with over 35 years of experience, including service as a Texas Judge, he has been an Attorney Advisor to the U.S. Federal Energy Administration (now D.O.E.) and a special legal counsel to the Texas House of Representatives. His business experience includes the presidencies of Argyle Energy Company, an oil and gas exploration company, and the Texas Legal Foundation, a public interest law foundation dedicated to the preservation of the free enterprise

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WHAT IS HAZARDOUS WASTE?

WHAT ARE THE "RCRA" REGULATIONS?

DETERMINE YOUR GENERATOR STATUS



**Why should you attend Ken Reilly's
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"This is the best training manual I've seen in eleven years with D.E.P."

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"Thanks again for the inspiring seminar. You obviously are dedicated to your work."

"... you made an excellent presentation..."

"The RCRA regulations are very serious business and I feel much better knowing that I received training from someone so knowledgeable in the "environmental world".

system. Ken teaches with the expertise of an environmental attorney, the understanding of a regulator, and the experience of a business man. Not only does he translate difficult legal jargon into plain English, but he also understands what you, the business person, wants to know most: how to stay in compliance with these regulations.

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Training - It's The Law

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Hazardous Materials & Waste Management

Training, Testing & Compliance Seminar

Including the
Dot International Harmonization Requirements
ANY Person Engaged in ANY Activity Involving Hazardous Materials and Waste
Must Successfully Complete an Annual/Triennial Training & Testing Program

Federal law requires all persons engaged any activity involving hazardous materials, substances, chemicals and waste to complete an updated training program on the Federal regulations requiring compliance.

The Training outlined in this brochure is designed to meet the requirements for:

U.S. & State Departments of Transportation (Section 172.700, 49 CFR)

State and Federal DOT regulations require each shipper, generator, carrier and transporter to instruct and test all company officials, employees or agents on the applicable hazardous materials regulations pertaining to their job functions and contact with hazardous materials and substances on a triennial basis.

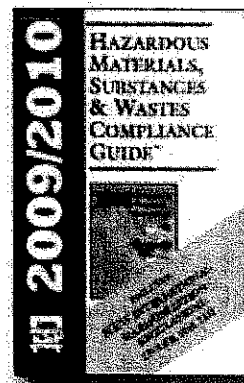
U.S. & State Environmental Protection Agencies (Part 262 and 265.16, 40 CFR)

State and Federal EPA regulations require each generator and owner/operator of a TSD Facility to ensure that all employees engaged in any activity involving hazardous waste successfully complete a training program on the applicable DOT, OSHA and EPA regulations. This requirement must be carried out on an annual basis.

Occupational Safety & Health Administration (Sections 1910.120, 1910.1200, 29 CFR)

Why Should I Attend THIS SEMINAR?

TSP specializes in meeting the Training requirements of DOT/EPA/OSHA. Not only will you receive the required training necessary to comply with DOT/EPA/ OSHA, but you will also receive the materials needed for your training to be successful and complete. Our commitment to you is only beginning at the close of the seminar. Because of our affiliation with Hazardous Materials Publishing Company, we are able to help you meet all of your ongoing compliance needs.



The "Critical Interface" Problem

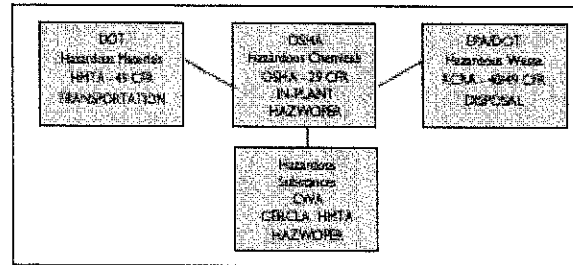
Compliance may become clearer when the "INTERFACE" is laid out as per the chart. For example, when one of the 50,000 plus Hazardous Materials is in transportation, it is subject to the DOT Regulations in 49 CFR. When used in-plant, it now is subject to the OSHA Regulations in 29 CFR. When it

In addition to the HAZARD DETERMINATION & COMMUNICATION training requirement for each person exposed to Hazardous Substances in a workplace, OSHA has mandated under CERCLA/SARA training to be carried out for generators, TSD Facilities and Emergency Response personnel on hazardous waste operations and emergency response.

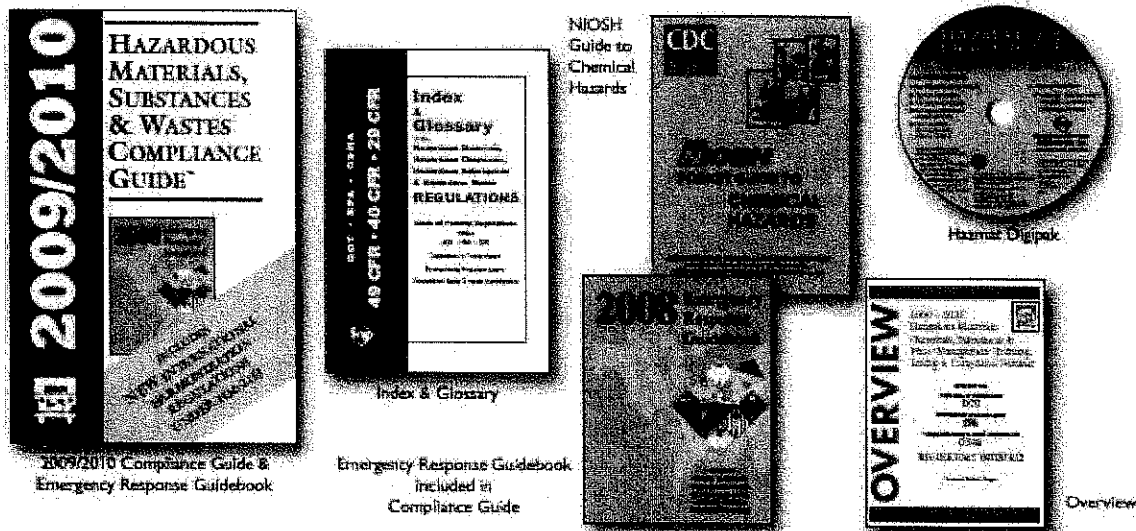
Who Should Attend?

- Managers and company personnel responsible for compliance with the DOT/EPA/OSHA regulations for hazardous materials, substances, chemicals or waste.
- Managers and company personnel who must instruct others on applicable DOT/EPA/OSHA regulations.
- Company hazmat employees who need either the required initial or annual update training.

no longer has a value and will be discarded, it is subject to the joint DOT/EPA/OSHA Regulations in 49/ 40/29 CFRs. If, at any time in either of these three areas, it is released or discharged from its container into the environment in an "RQ" quantity, and is not recovered, it is now a Hazardous Substance and is subject to the reporting responsibilities of the Clean Water Act, the Hazardous Materials Transportation Act, the Comprehensive Environmental Response, Compensation and Liability Act, and SARA/Title III. Understanding these interfaces is one of the objectives of the seminar.



Each participant receives a TSP Seminar Kit which includes the following:



Questions about our Seminar
About the Instructor

		Participants: <input type="text" value="1"/>
One (1) Participant	\$ 340.00	<input type="button" value="One (1) Participant"/> <input type="button" value="Add to Cart"/>
Two (2) to five (5) Participants	\$ 325.00 each	
Six (6) to ten (10) Participants	\$ 310.00 each	
Eleven (11) or more Participants	\$ 290.00 each	

Training - It's the Law!



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To arrange
Refresher
Course training

**Hazardous Waste Operations
Refresher Training
Satisfies 29 CFR 1910.120**

Applicability: All employees, managers, and supervisors who have completed the 24- and 40-hour Hazwoper course must receive 8 hours of refresher training annually. Meets 40CFR RCRA annual review of employee training.

Prerequisites: Hazwoper Training

Frequency and Duration: This training program requires 8 hours to complete.

Purpose and Overview:

Safety Training Services, Inc. offers a refresher course in hazardous waste operations and emergency response. During this training program, participants will review:

- Health and safety issues and dangers present at hazardous waste sites.
- How to obtain names of personnel and alternates responsible for site safety & health.
- Work practices for minimizing risks from site hazards.
- Monitoring procedures and requirements.
- Informational programs.
- Procedures for handling drums and containers.
- Decontamination procedures.
- Procedures for emergency response by employees at uncontrolled hazardous waste sites.
- Illumination requirements.
- Sanitation practices at temporary workplaces.
- Medical surveillance requirements including recognition of symptoms and signs that might indicate overexposure to hazardous materials.
- Engineering controls, work practices, and personal protective equipment for employee protection.

Training Materials: Those attending this training program will receive a training manual that includes a detailed script keyed to overhead graphics. A certificate and wallet card will be awarded to the student upon successful completion of the training program.

**FOR MORE INFORMATION OR TO REGISTER CALL US TOLL FREE
877-724-2744**



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**SAFETY TRAINING
SERVICES, INC.**

Training
Refresher
Consulting

**Hazardous Waste Operations
40-Hour Hazardous Waste & Emergency Response [Technician Level]
Satisfies 29 CFR 1910.120 (e)**

Applicability: All employees (including managers and supervisors) who work at a hazardous waste site in which there exists a possibility of exposure to hazardous substances.

Prerequisites: None

Frequency and Duration: This training program requires 40-hours to complete and refresher training is required annually.

Purpose and Overview:

Safety Training Services, Inc. has developed a comprehensive training program that encompasses all aspects of hazardous waste operations. This training covers:

- Health and safety programs.
- Site characterization and analysis.
- Appropriate site control procedures.
- Employee training requirements (29 CFR 1910.120 [e]).
- Engineering controls, work practices, and personal protective equipment for employee protection.
- Monitoring procedures and requirements.
- Informational programs.
- Procedures for handling drums and containers.
- Decontamination procedures.
- Procedures for emergency response by employees at uncontrolled hazardous waste sites.
- Illumination requirements.
- Sanitation practices at temporary workplaces.

Training Materials: Those attending this training program will receive (1) a training manual that includes a detailed script keyed to overhead graphics, and (2) the U.S. Department of Transportation's Emergency Response Guidebook. A certificate and wallet card will be awarded to the student upon successful completion of the training program.

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Occupational Training & Supply, Inc.

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PREFACE

You are here because you are or will be employed at a hazardous waste site and you have already received the 40-hour introductory training.

Goals for this program are:

- ➡ to review basic skills and knowledge about hazardous waste site work.
- ➡ to provide an opportunity to engage in learning and problem solving activities which will help to improve safety and health condition on a site.
- ➡ to reinforce safe work practices.
- ➡ to reinforce the role of personal protective equipment on a site.
- ➡ to reinforce the significance of a site-specific safety and health plan in controlling hazards.
- ➡ to meet training requirements stated in Section (e) (8) of the Hazardous Waste Operations and Emergency Response Standard, 29 CFR 1910.120.

National Fire Academy Training Courses

Course:

Hazwoper 8 Hour Refresher Course

All emergency response employees, with exception of skilled support personnel, are required to have annual refresher training sufficient duration and content to maintain their competencies. This 8-hour refresher course satisfies the annual training requirements. Current (un-expired) proof of prior certification must be submitted before course registration.

The Hazardous Waste Operations and Emergency Response (HAZWOPER) rule regulates emergency response to hazardous substances. Section 1910.120 (q) of the rule requires employers whose employees are engaged in emergency response to develop and implement an emergency plan. This plan must include compliance with training requirements for each employee involved.

SAFETY TRAINING ACADEMY
Environmental Health and Safety
Attendance Log

Training Subject: Laboratory Services Building Contingency Plan

Date of Training: 7-27-10

Trainer's Name: Melissa Jackson

Page 1 of 1

PLEASE PRINT Employee Name		CNet ID & Chicago ID #	Job Title & Department	Check <u>ONLY</u> if BSD Employee	Supervisor Phone # & Name
First Name <u>Hugo</u>	CNet ID	Job Title <u>UTILITY WORKER</u>	BSD Medical Center <input type="checkbox"/>	Phone # <u>773-834-3308</u>	
Last Name <u>Zedriguez</u>	Chicago ID #	Department <u>ENVIRONMENTAL HEALTH & SAFETY</u>	BSD Campus <input type="checkbox"/>	Supervisor <u>KRISTA COOLEY</u>	
First Name <u>Krista</u>	CNet ID <u>Kcooley</u>	Job Title <u>Associate Director</u>	BSD Medical Center <input type="checkbox"/>	Phone # <u>773-834-1133</u>	
Last Name <u>Cooley</u>	Chicago ID #	Department <u>Environmental Health & Safety</u>	BSD Campus <input type="checkbox"/>	Supervisor <u>Steve Beaudoin</u>	
First Name <u>Christopher</u>	CNet ID	Job Title <u>Industrial Hygienist</u>	BSD Medical Center <input type="checkbox"/>	Phone # <u>773-834-9815</u>	
Last Name <u>Harvey</u>	Chicago ID # <u>Cpharvey</u>	Department <u>Environmental Health & Safety</u>	BSD Campus <input type="checkbox"/>	Supervisor <u>Krista Cooley</u>	
First Name <u>Paula</u>	CNet ID	Job Title <u>Industrial Hygienist</u>	BSD Medical Center <input type="checkbox"/>	Phone # <u>4-1130</u>	
Last Name <u>Dillon</u>	Chicago ID # <u>pdillon</u>	Department <u>Environmental Health & Safety</u>	BSD Campus <input type="checkbox"/>	Supervisor <u>K Cooley</u>	
First Name <u>Kevin</u>	CNet ID	Job Title <u>Industrial Hygienist</u>	BSD Medical Center <input type="checkbox"/>	Phone # <u>773-702-5663</u>	
Last Name <u>Rohrer</u>	Chicago ID # <u>Krohrer</u>	Department <u>Environmental Health & Safety</u>	BSD Campus <input type="checkbox"/>	Supervisor <u>Krista Cooley</u>	
First Name <u>Amanda</u>	CNet ID <u>awillett</u>	Job Title <u>Senior Data Controller</u>	BSD Medical Center <input type="checkbox"/>	Phone # <u>2-9955</u>	
Last Name <u>Serrano</u>	Chicago ID # <u>21490908V</u>	Department <u>Environmental Health & Safety</u>	BSD Campus <input type="checkbox"/>	Supervisor <u>Krista Cooley</u>	
First Name <u>Jill</u>	CNet ID <u>Jsingleton</u>	Job Title <u>Admn. Asst.</u>	BSD Medical Center <input type="checkbox"/>	Phone # <u>4-5130</u>	
Last Name <u>Singleton</u>	Chicago ID #	Department <u>Environmental Health & Safety</u>	BSD Campus <input type="checkbox"/>	Supervisor <u>Krista Cooley</u>	
First Name <u>Melissa</u>	CNet ID <u>mgilmore</u>	Job Title <u>Industrial Hygienist</u>	BSD Medical Center <input type="checkbox"/>	Phone # <u>4-7939</u>	
Last Name <u>Jackson</u>	Chicago ID #	Department <u>Environmental Health & Safety</u>	BSD Campus <input type="checkbox"/>	Supervisor <u>Krista Cooley</u>	
First Name	CNet ID	Job Title	BSD Medical Center <input type="checkbox"/>	Phone #	
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor	

SAFETY TRAINING ACADEMY
Environmental Health and Safety
Attendance Log

Training Subject: Laboratory Services Building Contingency Plan

Date of Training: 7-28-10

Trainer's Name: Melissa Jackson

Page 1 of 1

PLEASE PRINT Employee Name	CNet ID & Chicago ID #	Job Title & Department	Check <u>ONLY</u> if BSD Employee	Supervisor Phone # & Name
First Name <u>THOMAS</u>	CNet ID	Job Title <u>SAFETY TECH</u>	BSD Medical Center <input type="checkbox"/>	Phone # <u>773-702-9999</u>
Last Name <u>HOSACK</u>	Chicago ID #	Department <u>EHS</u>	BSD Campus <input type="checkbox"/>	Supervisor <u>KRISTA Cooley</u>
First Name	CNet ID	Job Title	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor
First Name	CNet ID	Job Title	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor
First Name	CNet ID	Job Title	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor
First Name	CNet ID	Job Title:	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor
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First Name	CNet ID	Job Title	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor

SAFETY TRAINING ACADEMY
Environmental Health and Safety
Attendance Log

Training Subject: Laboratory Services Building Contingency Plan
Date of Training: 7-29-10
Trainer's Name: Melissa Jackson

Page 1 of 1

INITIALS

PLEASE PRINT Employee Name	CNet ID & Chicago ID #	Job Title & Department	Check <u>ONLY</u> if BSD Employee	Supervisor Phone # & Name
First Name JOSEPH (JS)	CNet ID	Job Title LAB PACK SUPERVISOR	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name SAPIENZA	Chicago ID #	Department WILPEN ENVIRONMENTAL	BSD Campus <input type="checkbox"/>	Supervisor
First Name MICHAEL (MW)	CNet ID	Job Title LAB PACK SUPERVISOR	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name WILK	Chicago ID #	Department WILPEN ENVIRONMENTAL	BSD Campus <input type="checkbox"/>	Supervisor
First Name JOHN (JA)	CNet ID	Job Title LAB PACK TECHNICIAN	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name ALTENBACH	Chicago ID #	Department WILPEN ENVIRONM.	BSD Campus <input type="checkbox"/>	Supervisor
First Name RALPH (RE)	CNet ID	Job Title LAB PACK TECHNICIAN	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name ESPOSITO	Chicago ID #	Department WILPEN ENVIRONMENTAL	BSD Campus <input type="checkbox"/>	Supervisor
First Name	CNet ID	Job Title:	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor
First Name	CNet ID	Job Title	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor
First Name	CNet ID	Job Title	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor
First Name	CNet ID	Job Title	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor
First Name	CNet ID	Job Title	BSD Medical Center <input type="checkbox"/>	Phone #
Last Name	Chicago ID #	Department	BSD Campus <input type="checkbox"/>	Supervisor

Attachment C

Attachment C includes the following:

- The University of Chicago's Contingency Plan; and
- RCRA Site ID Form 8700-12.



The University Of Chicago
.Risk Management, Audit and Safety.
Environmental Health and Safety
6054 South Drexel Avenue, Chicago, Illinois 60637

Laboratory Service Building
Contingency Plan

Facility Name: Laboratory Service Building
Location: 6041 South Blackstone Avenue, Chicago, Illinois
Operator: The University of Chicago

1. General information

Laboratory Service Building is a receiving point for waste chemicals from research and teaching laboratories of the University of Chicago and the University of Chicago Medical Center. Chemicals are received at the facility, sorted and segregated, and stored until a disposal contractor comes on-site to lab pack them. Chemicals are normally received in original containers; usually glass or plastic bottles ranging in size from a few ounces to approximately one gallon. Flammable chemicals may be consolidated into 55-gallon drums for ease of storage and disposal.

The building is a one-story masonry structure without attachment to any other buildings. It is remotely located on the far southeast side of the university campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue.

The building occupies an area of 31 feet by 38 feet with finished concrete floor. To the east side of the building there is a fenced yard with a concrete patio. Inside the building it is subdivided into several areas (rooms), including a laboratory, to store chemicals of the same compatibility (flammable, reactive, toxic, and corrosive) and each room is labeled as such. The floor plan and designation of each area is shown on map.

2. Emergency Coordinators and Responders

Primary Coordinator: Steven Beaudoin
Director Environmental Health and Safety
115 Denell Drive
Crete, Illinois 60417
Office Phone: 773-702-9999
Home Phone: 708-672-6975

Alternate Coordinator: Krista Cooley
Associate Director Environmental Health and Safety
79 Oak Tree Drive
Valparaiso, Indiana 46383
Office Phone: 773-702-9999
Home Phone: 219-462-8592

Duties of Emergency Coordinators:

- Signing hazardous waste manifest;
- Providing a "On-Call" Safety Officer twenty-four hours a day, seven days a week;
- Responding with appropriate action to control and remedy the incident;
- Responding to a reported incident in a timely manner;
- Maintaining liaison with the local Police and Fire Departments;
- Notifying Administration of an incident and providing periodic status reports;
- Reviewing and amending the Emergency Response Plan for Hazardous Materials; and
- Taking post-emergency measures to prevent reoccurrences of the incident.

Duties of Industrial Hygienists

- Inspecting the hazardous waste storage facility to ensure hazardous waste is labeled and stored appropriately and all emergency equipment is in good working condition in accordance with Appendix B;
- Responding to emergency incidents at the hazardous waste storage facility; and
- Rotating as "On-Call" Safety Officer twenty-four hours a day, seven days a week.

Duties of Safety Technician and Utility Worker

- Inspecting the hazardous waste storage facility to ensure hazardous waste is labeled and stored appropriately and all emergency equipment is in good working condition in accordance with Appendix B; and
- Responding to emergency incidents at the hazardous waste storage facility.

Duties of the Administrative Assistant and Senior Data Control Clerk

- Entering hazardous waste pick up requests;
- Generating weekly pick up reports for the contractor;
- Entering waste pick up disposal logs; and
- Electronically filing hazardous waste manifests.

3. Notification

When fire, explosion, or any unexpected release occurs, the facility operator or personnel should immediately:

- Notify other personnel in the building by voice. The facility is small enough that a voice amplification system is not required;
- Notify University Police by dialing 123 from a campus phone or 773-702-8181 from a non-campus phone;
- Notify emergency coordinator(s) listed on page 1.

4. Control Procedures

1. City Fire Department will respond immediately to any fire, explosion or release of hazardous materials. The Fire Department will contain and control any fire involved at the facility with the assistance of the emergency coordinator. Spill releases will be controlled through use of absorbent material such as vermiculite and spill control pillows.
2. Spill material with the absorbent will be picked up and placed in appropriate storage containers for disposal through the University of Chicago's waste disposal

contractor. The facility operator will remove all waste from the spill area for ease of clean-up. The facility will not accept new waste until the spill or leak has been cleaned up and controlled.

3. All equipment and containers will be decontamination or replaced prior to resuming normal operation in the Laboratory Service Building following conclusion of emergency response and clean-up procedures.

5. Emergency Equipment

An emergency shower and eyewash are located by the doorway leading from the office/chemical sorting area to the storage rooms. (See Appendix B)

Two Class ABC fire extinguishers are located in the office/chemical sorting room and one Class D fire extinguisher is located in the hallway between the storage rooms. The facility is equipped with a smoke detector system that alarms directly at the Campus Police Department. Extinguishers are intended for use by staff during fire emergencies. These devices are needed to warn occupants of a fire and to summon the fire department.

Chemical spill kit consisting of vermiculite and absorbent snakes is located in a yellow container on the countertop by the front entrance door. (See Appendix B attached)

Laboratory coats, face shields, and rubber gloves are located in the chemical sorting area. Neutralizers, absorbent material, safety goggles, scoops, base control, are located in the storage cabinets located adjacent to, across from and under the fume hood. These materials are necessary to ensure the safety of staff working in the facility during normal or emergency situations.

6. Evacuation Plan

Evacuation of the facility will be initiated by voice signal to personnel inside. Evacuation from the area will be made by Dorchester Avenue north to Midway Plaisance. Alternate evacuation route would be to go south on Dorchester Avenue.

7. Coordination Agreement Arrangements

The University of Chicago maintains its Police Department and medical facility (The University of Chicago Medical Center). Arrangements have been made with the following response teams in case of an emergency. Copies of this Contingency Plan were sent to each agency.

- University of Chicago Police Department
6054 S. Drexel Avenue
Chicago, Illinois 60637
Phone: (773)702-8181
- The University of Chicago Medical Center
Emergency Care
Bernard Mitchell Hospital, 901 East 58th Street
Chicago, Illinois 60637
Phone: (773)702-6250

- City of Chicago Police Department
District Commander
1121 South State Street
Chicago, Illinois
Phone: (312)744-4000
- City of Chicago Fire Department
District Chief
5955 South Ashland Avenue
Chicago, Illinois 60636
Phone: (312)747-5017
- City of Chicago Fire Department
Hazardous Materials Chief
558 West DeKoven Street
Chicago, Illinois 60607
Phone: (312)747-6582

8. Required Reports

A follow-up report detailing the incident, emergency response, clean-up, and actions taken to prevent reoccurrence will be prepared and submitted to the Illinois Environmental Protection Agency within 15 days of occurrence. All records concerning the incident and report will be maintained by the facility operator until three years after final closure of the Laboratory Service Building.

9. Contingency Plan Review

The Contingency Plan will be reviewed on an annual basis by the Environmental Health and Safety Office and the Hazardous Waste Contractor.

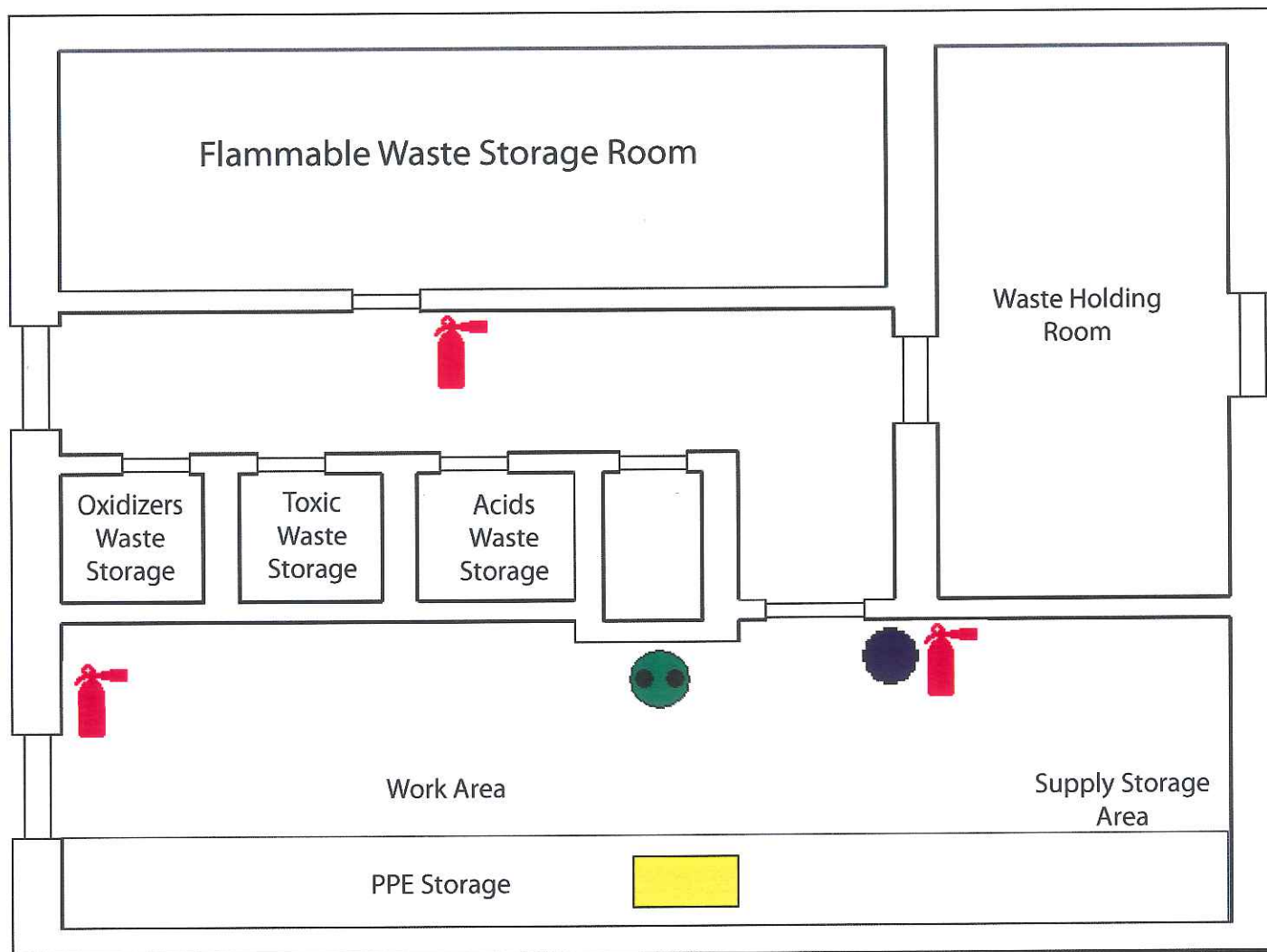
Revised: July 27, 2010



University of Chicago Laboratory Services Building

6041 South Blackstone Avenue
Chicago, IL 60637

 NORTH	
	Emergency Shower Location
	Emergency Eyewash Location
	Fire Extinguisher Location
	Spill Kit Location
*Building equipped with security system	



Appendix A



The University Of Chicago
 .Risk Management, Audit and Safety.
 Environmental Health and Safety
 6054 S. Drexel Avenue, Chicago, Illinois 60637

Name	Job Title	Training Date	Training
Steve Beaudoin	Director	March 11, 2010 May 13, 2003	RCRA Compliance Training Hazardous Materials Refresher Training
Krista Cooley	Associate Director	December 9, 2010 May 14, 2010	RCRA Compliance Training Hazardous Materials Refresher Training
Melissa Jackson	Industrial Hygienist	June 15, 2010	Hazardous Materials Refresher Training
Sarah Grover ¹	Industrial Hygienist	July 17, 2009	Hazardous Materials Refresher Training
Kevin Rohrer	Industrial Hygienist	August 14, 2009	Hazardous Materials Refresher Training
Chris Harvey	Industrial Hygienist	May 24, 2010	Hazardous Materials Refresher Training
Paula Dillon	Industrial Hygienist	August 21, 2009	Hazmat Technician Level Refresher
Thomas Hosack	Safety Technician	April 2, 2010	Hazardous Materials Refresher Training
Hugo Rodriquez	Utility Worker	July 16, 2010	Hazardous Waste and Emergency Response Training
Jill Singleton	Administrative Assistant	N/A	N/A
Amanda Serrano	Senior Data Control Clerk	N/A	N/A

¹Sarah Grover's last date of employment at the University of Chicago was on July 9, 2010.

Job Descriptions:

Director – Primary Emergency Coordinator related to hazardous waste management who provides an “On-Call Safety Officer twenty-four hours a day, seven days a week; responds to a reported incident in a timely manner; responds with appropriate action to control and remedy the incident; maintains liaison with the local Police and Fire Department; notifies the Administration of an incident and provides periodic status reports; reviews and amends the Emergency Response Plan for Hazardous Materials; and takes post-emergency measures to prevent reoccurrences of the incident.

Appendix A

Associate Director – Alternate Emergency Coordinator related to hazardous waste management, who in the absence of the Primary Emergency Coordinator: provides an “On-Call Safety Officer twenty-four hours a day, seven days a week; responds to a reported incident in a timely manner; responds with appropriate action to control and remedy the incident; maintains liaison with the local Police and Fire Department; notifies the Administration of an incident and provides periodic status reports; reviews and amends the Emergency Response Plan for Hazardous Materials; and takes post-emergency measures to prevent reoccurrences of the incident.

Industrial Hygienist – Inspects the hazardous waste storage facility to ensure hazardous waste is labeled and stored appropriately and all emergency equipment is in good working condition; responds to emergency incidents at the hazardous waste storage facility; and rotates as “On-Call Safety Officer twenty-four hours a day, seven days a week.

Safety Technician – Inspects the hazardous waste storage facility to ensure hazardous waste is labeled and stored appropriately and all emergency equipment is in good working condition; and responds to emergency incidents at the hazardous waste storage facility.

Utility Worker - Inspects the hazardous waste storage facility to ensure hazardous waste is labeled and stored appropriately and all emergency equipment is in good working condition; and responds to emergency incidents at the hazardous waste storage facility.


Administrative Assistant – Enters hazardous waste pick up requests; generates weekly pick up reports for the contractor; enters waste pick up disposal logs; and electronically files hazardous waste manifests.

Senior Data Control Clerk - Enters hazardous waste pick up requests; generates weekly pick up reports for the contractor; enters waste pick up disposal logs; and electronically files hazardous waste manifests.

Appendix B

Lab Services Weekly Inspection

	Area of Inspection	Check	Remarks
Internal Safety	Building Structure – Floor Seamline in Good Condition (e.g., no cracks, deterioration, evidence of leakage)		
	Building Structure – Sills in Good Condition (e.g., no cracks, deterioration, evidence of leakage)		
	Building Structure – All Doors Lock		
	Leaks and Spills – None Present for 55-Gallon Drums		
	Leaks and Spills – None Present for Glass and Plastic Bottles		
	All Containers Labeled Appropriately including Accumulation Dates		
	All Labels Facing Outward		
	Aisles Present Between all Drums		
	Working Space Available		
	Personal Protective Equipment Available		
	Emergency Eyewash Operational		
	Emergency Shower Operational		
	External Security	Security alarm functionality tested, including tie to UCPD Note: Test on a monthly basis	
Unusual items – None found around premises (debris, suspicious materials or people, etc)			
Fence & Gate – No broken fences, walls, or other barriers			
Fence line kept free of debris and other objects that could allow entry over the fence (trees, bushes, pallets, skids, etc)			
Windows & Doors – Closed and secured with reliable locking mechanisms			
Safety Officer:		Date and Time:	

SEND TO: The Appropriate State or Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input checked="" type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below) <input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup <u>in one or more months</u> of the report year (or State equivalent LQG regulations)		
2. Site EPA ID Number	EPA ID Number I L D 0 0 5 4 2 1 1 3 6		
3. Site Name	Name: University of Chicago		
4. Site Location Information	Street Address: 6041 S. Blackstone Avenue		
	City, Town, or Village: Chicago		County: Cook
	State: Illinois	Country: USA	Zip Code: 60637
5. Site Land Type	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. NAICS Code(s) for the Site (at least 5-digit codes)	A. 6 1 1 3 1 0	C. 	
	B. 6 2 2 1 1 0	D. 	
7. Site Mailing Address	Street or P.O. Box: 6054 S. Drexel Avenue - Suite 219		
	City, Town, or Village: Chicago		
	State: Illinois	Country: USA	Zip Code: 60637
8. Site Contact Person	First Name: Steve		MI: Last: Beaudoin
	Title: Director, Environmental Health & Safety		
	Street or P.O. Box: 6054 S. Drexel Avenue - Suite 219		
	City, Town or Village: Chicago		
	State: Illinois	Country: USA	Zip Code: 60637
	Email: sbeaudoi@uchicago.edu		
	Phone: (773) 702-9999	Ext.:	Fax: (773) 702-6546
9. Legal Owner and Operator of the Site	A. Name of Site's Legal Owner: University of Chicago		Date Became Owner: 1/1/1890
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box: 6054 S. Drexel Avenue - Suite 219		
	City, Town, or Village: Chicago		Phone: (773) 702-9999
	State: Illinois	Country: USA	Zip Code: 60637
	B. Name of Site's Operator: Same as Owner		Date Became Operator: 7/15/1991
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-7.

- Y ☒ N ☐ 1. **Generator of Hazardous Waste**
If "Yes", mark only one of the following – a, b, or c.
- ☒ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.

If "Yes" above, indicate other generator activities.

- Y ☐ N ☒ d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.
- Y ☐ N ☒ e. United States Importer of Hazardous Waste
- Y ☒ N ☐ f. Mixed Waste (hazardous and radioactive) Generator

- Y ☐ N ☒ 2. **Transporter of Hazardous Waste**
If "Yes", mark all that apply.
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)
- Y ☐ N ☒ 3. **Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste permit is required for these activities.
- Y ☐ N ☒ 4. **Recycler of Hazardous Waste**
- Y ☐ N ☒ 5. **Exempt Boiler and/or Industrial Furnace**
If "Yes", mark all that apply.
- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption
- Y ☐ N ☒ 6. **Underground Injection Control**
- Y ☐ N ☒ 7. **Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

- Y ☐ N ☒ 1. **Large Quantity Handler of Universal Waste** (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.
- a. Batteries ☐
- b. Pesticides ☐
- c. Mercury containing equipment ☐
- d. Lamps ☐
- e. Other (specify) _____ ☐
- f. Other (specify) _____ ☐
- g. Other (specify) _____ ☐

- Y ☐ N ☒ 2. **Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

- Y ☐ N ☒ 1. **Used Oil Transporter**
If "Yes", mark all that apply.
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)
- Y ☐ N ☒ 2. **Used Oil Processor and/or Re-refiner**
If "Yes", mark all that apply.
- ☐ a. Processor
- ☐ b. Re-refiner
- Y ☐ N ☒ 3. **Off-Specification Used Oil Burner**
- Y ☐ N ☒ 4. **Used Oil Fuel Marketer**
If "Yes", mark all that apply.
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ❖ You must check with your State to determine if you are eligible to manage laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

- ☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:
- ☐ a. College or University
- ☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university
- ☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D006	D008	D009	D011	D018
F002	F003	F005				

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

ID Number 1 | L | D | 0 | 0 | 5 | 4 | 2 | 1 | 1 | 3 | 6 |

OMB#: 2050-0024; Expires 11/30/2011

12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☒ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

This form is being submitted to correct the site address and mailing address tied to this ID Number (Items #4 and 7).

14. **Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative

Name and Official Title (type or print)

Date Signed (mm/dd/yyyy)



Director Safety

7/7/10

Appendix A

Rec'd. 5/13/10 from UoC
from Sarah Grover
by DMS



The University Of Chicago
Risk Management, Audit and Safety.
Environmental Health and Safety
6054 South Drexel Avenue, Chicago, Illinois 60637

Laboratory Service Building Contingency Plan

Facility Name: Laboratory Service Building
Location: 6041 South Blackstone Avenue, Chicago, Illinois
Operator: The University of Chicago

1. General information

Laboratory Service Building is a receiving point for waste chemicals from research and teaching laboratories of the University of Chicago and the University of Chicago Medical Center. Chemicals are received at the facility, sorted and segregated, and stored until a disposal contractor comes on-site to lab pack them. Chemicals are normally received in original containers; usually glass or plastic bottles ranging in size from a few ounces to approximately one gallon. Flammable chemicals may be consolidated into 55-gallon drums for ease of storage and disposal.

The building is a one-story masonry structure without attachment to any other buildings. It is remotely located on the far southeast side of the university campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue.

The building occupies an area of 31 feet by 38 feet with finished concrete floor. To the east side of the building there is a fenced yard with a concrete patio. Inside the building it is subdivided into several areas (rooms), including a laboratory, to store chemicals of the same compatibility (flammable, reactive, toxic, and corrosive) and each room is labeled as such. The floor plan and designation of each area is shown on map.

2. Emergency Coordinators

Primary Coordinator: Steven Beaudoin
Director Environmental Health and Safety
115 Denell Drive
Crete, Illinois 60417
Office Phone: 773-702-9999
Home Phone: 708-672-6975

Alternate Coordinator: Krista Cooley
Associate Director Environmental Health and Safety
79 Oak Tree Drive
Valparaiso, Indiana 46383
Office Phone: 773-702-9999
Home Phone: 219-462-8592

Duties of Emergency Coordinators:

- Providing a "On-Call" Safety Officer twenty-four hours a day, seven days a week;
- Responding with appropriate action to control and remedy the incident;
- Responding to a reported incident in a timely manner;
- Maintaining liaison with the local Police and Fire Departments;
- Notifying Administration of an incident and providing periodic status reports;
- Reviewing and amending the Emergency Response Plan for Hazardous Materials; and
- Taking post-emergency measures to prevent reoccurrences of the incident.

3. Notification

When fire, explosion, or any unexpected release occurs, the facility operator or personnel should immediately:

- Notify other personnel in the building by voice. The facility is small enough that a voice amplification system is not required;
- Notify University Police by dialing 123 from a campus phone or 702-8181 from a non-campus phone;
- Notify emergency coordinator(s) listed on page 1.

4. Control Procedures

1. City Fire Department will respond immediately to any fire, explosion or release of hazardous materials. The Fire Department will contain and control any fire involved at the facility with the assistance of the emergency coordinator. Spill releases will be controlled through use of absorbent material such as vermiculite and spill control pillows.
2. Spill material with the absorbent will be picked up and placed in appropriate storage containers for disposal through the University of Chicago's waste disposal contractor. The facility operator will remove all waste from the spill area for ease of clean-up. The facility will not accept new waste until the spill or leak has been cleaned up and controlled.
3. All equipment and containers will be decontamination or replaced prior to resuming normal operation in the Laboratory Service Building following conclusion of emergency response and clean-up procedures.

5. Emergency Equipment

An emergency shower and eyewash are located by the doorway leading from the office/chemical sorting area, room 108, to the storage rooms. (See Figure 3 attached)

Two Class ABC fire extinguishers are located in the office/chemical sorting room and one Class D fire extinguisher is located in the hallway between the storage rooms. The facility is equipped with a smoke detector system that alarms directly at the Campus Police Department. Extinguishers are intended for use by staff during fire emergencies. These devices are needed to warn occupants of a fire and to summon the fire department.

Appendix A

Laboratory coats, face shields, and rubber gloves are located in the chemical sorting area. Neutralizers, absorbent material, safety goggles, scoops, base control, are located in the storage cabinets located adjacent to, across from and under the fume hood. These materials are necessary to ensure the safety of staff working in the facility during normal or emergency situations.

6. Evacuation Plan

Evacuation of the facility will be initiated by voice signal to personnel inside. Evacuation from the area will be made by Dorchester Avenue north to Midway Plaisance. Alternate evacuation route would be to go south on Dorchester Avenue.

7. Coordination Agreement Arrangements

The University of Chicago maintains its Police Department and medical facility (The University of Chicago Medical Center). Arrangements have been made with the following response teams in case of an emergency. Copies of this Contingency Plan were sent to each agency.

- University of Chicago Police Department
5555 South Ellis Avenue
Phone: 702-8181
- The University of Chicago Medical Center
Emergency Care
Bernard Mitchell Hospital, 901 East 58th Street
Phone: 702-6250
- City of Chicago Police Department
District Commander
1121 South State Street
Chicago, Illinois
Phone: 744-4000
- City of Chicago Fire Department
District Chief
5955 South Ashland Avenue
Chicago, Illinois 60636
Phone: 747-5017
- City of Chicago Fire Department
Hazardous Materials Chief
558 West DeKoven Street
Chicago, Illinois 60607
Phone: 747-6582

8. Required Reports

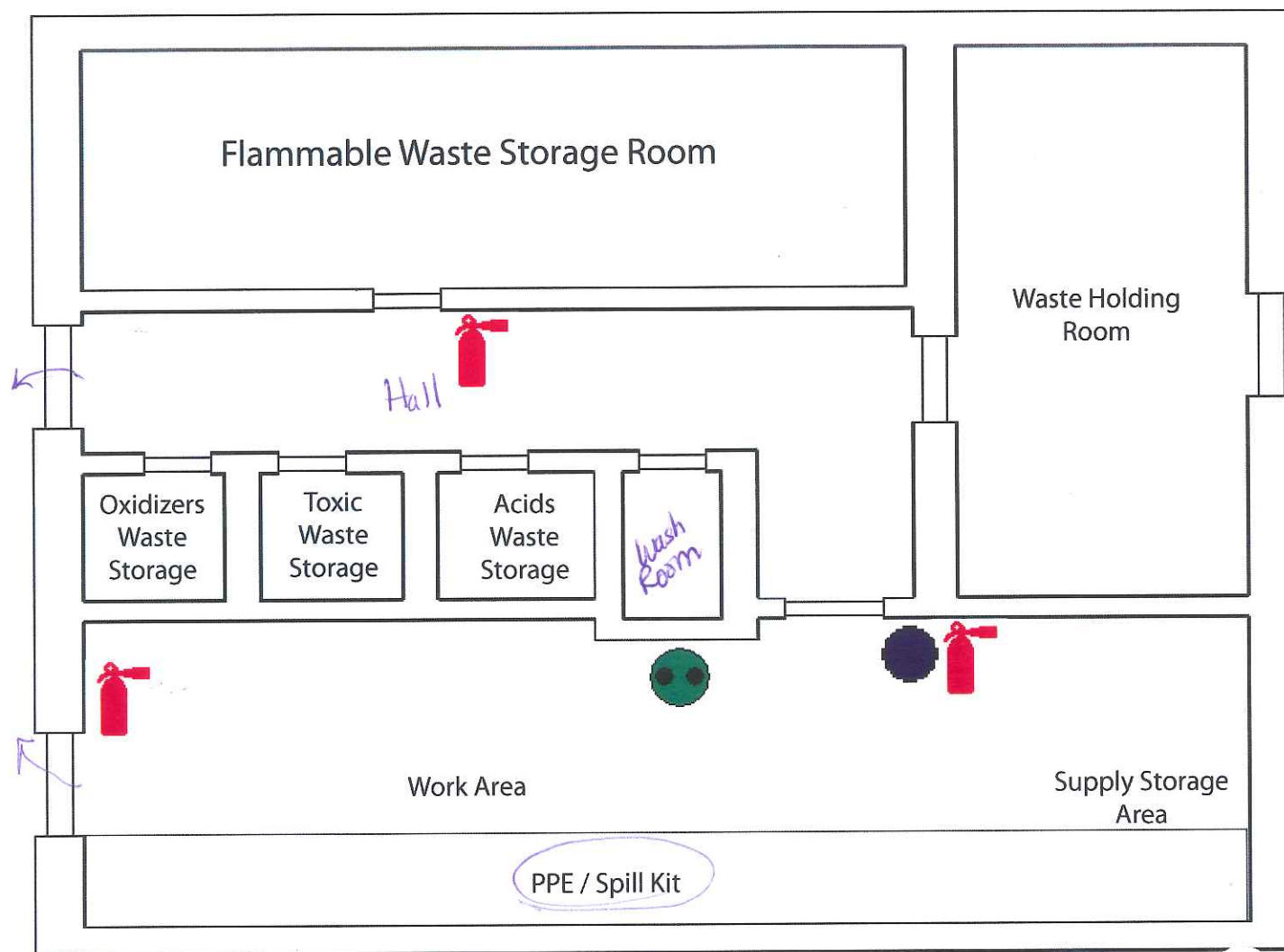
A follow-up report detailing the incident, emergency response, clean-up, and actions taken to prevent reoccurrence will be prepared and submitted to the Illinois Environmental Protection Agency within 15 days of occurrence. All records concerning the incident and report will be maintained by the facility operator until three years after final closure of the Laboratory Service Building.







University of Chicago

Laboratory Services Building

6049 South Blackstone Avenue
Chicago, IL 60637



 NORTH	
	Emergency Shower Location
	Emergency Eyewash Location
	Fire Extinguisher Location
*building equipment with security alarm.	



**HON. KEN REILLY'S
ENVIRONMENTAL COMPLIANCE SEMINAR**

THIS CERTIFIES THAT Steven Beaudoin

**Has enrolled in and Completed
The Emergency Coordinator and
Hazardous Waste Management Compliance Seminar**

This Certificate represents a sincere effort on their company's behalf and on their own behalf to comply with the Environmental Protection Agency Hazardous Waste Regulations.

AWARDED MARCH 11, 2010



Ken Reilly

Recd. 5/13/10 from uofC

Transportation Skills Programs, Inc.

Certificate of Training

Krista Cooley

This Certifies That _____

has successfully completed the

TSP Hazardous Materials & Waste Management and Compliance Seminar

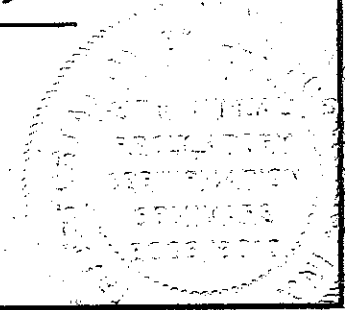
in a sincere effort to comply with the mandatory and annual training and testing requirements of
the U.S. Department of Transportation (49 CFR 172.704),
the Environmental Protection Agency (40 CFR 262.34(a)(4) & 265.16),
or the Occupational Safety and Health Administration (29 CFR 1910.120(q)(6)(i)).

In Witness Whereof, this certificate is signed and sealed on this date Dec 9, 2009



Transportation Skills Programs, Inc.
243 West Main Street • P.O. Box 308
Kutztown, PA 19530-0308
610 683-7853

Robert J. Keegan, President



Rec'd: 5/13/10 from UofC
Sara

THE UNIVERSITY OF CHICAGO
Safety and Environmental Affairs

Title: Industrial Hygienist

Department: Safety and Environmental Affairs

Reports To: Director of Safety, Environmental Affairs and Radiation Safety

A. Duties and Responsibilities

The Industrial Hygienist will assist the Director in the management of the University's Safety Program by assuring the following.

Industrial Hygiene

- Anticipate, recognizes, evaluates, and control environmental factors, which may cause sickness, impaired health and well being among University employees, conduct industrial hygiene surveys (i.e., LAO, hazardous vapors monitoring, noise surveys, ventilation surveys) as requested or deemed necessary by regulations and develop corrective action plans as necessary.
- Conduct annual fume hood certifications.

Manage the University Asbestos Program by:

- Collecting bulk building material samples and air samples as necessary;
- Ensuring that asbestos-containing materials are maintained in a manner to prevent fiber release; and
- Act as the Local Educational Agency designated person to ensure compliance with all Illinois Department of Public Health regulations in the Laboratory Schools and Orthogenics.

Manage and design asbestos abatement projects on campus by:

- Conducting pre-renovation surveys;
- Procuring the services of asbestos abatement contractors and consultants; and
- Providing support to project management during renovation and demolition projects, and - Ensuring projects are conducted in accordance with all state, federal and local regulations.

Inspections

- Conduct semi-annual laboratory building inspections to ensure compliance with the applicable internal and external safety regulations.
- Conduct semi-annual asbestos building materials reviews for the Laboratory Schools and Orthogenics School.

Qualifications

- Degree in Occupational Health and Safety or equivalent.
- The candidate should have 3-6 years experience in a progressive safety department.
- The candidate shall have strong familiarity with OSHA, EPA, IEPA, IDPH, NFPA, City of Chicago Building Codes.
- Certification at the level of Hazardous Materials Technician or higher classification is beneficial. 5. Licensed as an IDPH Asbestos Building Inspector and Project Manager.
- Computer knowledge in Windows NT, File Maker Pro, Microsoft Access, Microsoft Word.

Safety

- Conduct safety/accident investigations as assigned.
- Conduct ergonomic evaluations of workstation design and/or work activities.
- Participate in the continued review, development and implementation of safety programs, processes, and technologies.
- Review and interpret safety regulations as necessary.
- Act as a member of the Emergency Response Team by responding to chemical spills/releases, fires, and severe accidents 24 hours a day, 7 days a week.

Training

- Identify and develop training curricula as necessary.
- Conduct safety training as assigned or necessary.
- Conduct asbestos awareness training.

Environmental Compliance

- Manage the University's Title V Clean Air Act Permit, including the collection and compilation of data for the Annual Emissions Report.
- Manage the University's Underground Storage Tanks Program.
- Manage the collection of data and reporting for the Metropolitan Water Reclamation Water District. Review and interpret environmental regulations.

Regulatory Compliance

- Insure compliance with regulations pertaining to the EPA, IEPA, IDPH, City of Chicago and OSHA and other pertinent agencies.
- Acts as liaison with outside authorities such as EPA, IEPA, OSHA, IDPH, the City of Chicago, the Chicago Fire Department, and the State Fire Marshall.

Departmental Functions

- Develop and maintain a spirit of teamwork within the unit, Facilities Services and with the customer. Develops and ensures the regular tracking of appropriate performance measurements to support continuous improvement in Safety and Environmental Affairs and the University.
- Ensure that Safety operations and functions are performed in a timely, proactive, and effective manner to ensure that quality and customer service targets are maintained.
- Participate in setting and executing the strategic mission and priorities of the Facilities Services - Safety and Environmental Affairs.

Committee Representation

- The Industrial Hygienist shall represent the Facilities Services -Safety and Environmental Affairs as assigned.



THE UNIVERSITY OF CHICAGO
JOB DESCRIPTION

Rec'd. 5/13/10 from U of C

Specific Title: Safety Technician, ENVIRONMENTAL HEALTH AND SAFETY
Generic Title: Environmental Health & Safety Technician
Division/Department: Risk Management, Audit and Safety
Reports to: Krista Cooley, Associate Director Environmental Health and Safety

General Summary:

Under direct supervision, assists in the implementation of the University's environmental health and safety programs to safeguard employees and ensure regulatory compliance. Conducts routine inspections and tests of instruments, laboratories and/or other facilities to ensure proper functioning and compliance with government health and safety laws and University policies and procedures. Compiles data and assists with preparing reports. Performs data entry and helps maintain required documentation. Provides technical support, such as equipment calibration; specialized cleaning, including sanitizing and disinfecting equipment; and/or waste storage, removal, transport and disposal. Responds to emergency response situations (e.g., fire alarms, odor complaints, chemical spills) to serve in a support role. Responsible for safety equipment inventory maintenance.

Essential Functions:

- 40% Inspections: Conduct the following inspections to ensure regulatory compliance with the Occupational Safety and Health Administration, City of Chicago Fire Prevention Bureau, City of Chicago Building Department, and Environmental Protection Agency using the latest automated devices:
- General Building Inspections/Re-Inspections;
 - Laboratory Inspections/Re-Inspections; and
 - Food Establishment Inspections/Re-Inspections.

Other Functions:

- 10% Regulatory Liaison: Escort outside regulatory agency inspectors from the City of Chicago Building Department, Fire Prevention Bureau, and Public Health Department and assist in resolving any citations.
- 10% Permits: Conduct site inspections for welding, cutting, brazing and issue hot work permits to University employees and outside contractors.
- 10% Training: Conduct Fire Safety and Evacuation training sessions.
- 5% Emergency Response: Conduct emergency response activities (e.g., responding to odor complaints, cleaning up chemical spills), inspect and maintain emergency response equipment.
- 5% Fire Extinguishers: Oversee annual fire extinguisher re-certifications.
- 5% Fume Hoods: Conduct annual fume hood certifications and supplemental requests.



THE UNIVERSITY OF CHICAGO JOB DESCRIPTION

- 5% Industrial Hygiene: Conduct all industrial hygiene equipment internal and external calibrations.
- 5% Fire Drills: Conduct and/or witness fire drills.
- 5% Perform other duties as assigned by the Director or Associate Director.

Qualifications:

Candidates must demonstrate the following competencies: manage interpersonal relationships and interact/communicate with clarity, tact and courtesy with patrons, staff, faculty, students and others; communicate effectively in English, both orally and in writing; work on multiple projects simultaneously, set priorities and meet deadlines; exhibit excellent organizational skills; recognize and resolve or refer problems; ability to read and interpret instructions and regulations; ability to perform basic mathematical functions relevant to the position and have good problem-solving skills; work effectively with supervision and as a part of a team; ability to manage stressful situations; use or learn a range of position-related software applications; demonstrated skill working with Adobe Acrobat Professional and Microsoft Word, Excel, Access and Outlook required; knowledge of EH&S Assist or a similar type of database; must be very detailed and accurate; must be able to consistently meet daily, weekly and monthly dead-lines.

High school diploma or equivalent required. Bachelor's degree in science or a relevant field preferred. Knowledge of Occupational Safety and Health Administration, City of Chicago Fire Prevention Bureau, and City of Chicago Building Department codes. Experience conducting regulatory compliance inspections in an institutional setting preferred. OSHA 30-hour construction industry card preferred. Experience responding to emergency response situations (e.g., odor complaints, spills). Certification at the hazardous materials technician level preferred. Experience conducting safety training sessions. City of Chicago certification at the fire extinguisher serviceman level required. Knowledge of fume hood certification processes, types of industrial hygiene equipment and calibration procedures. Experience conducting fire drills preferred. A current valid driver's license required.

Mental Demands:

Ability to multi-task and manage multiple projects simultaneously; ability to work successfully with the University Community including students, faculty and staff; ability to work successfully with external organizations and individuals on behalf of the University; ability to work under pressure; verbal and written communication, and organizational skills; ability to problem solve; ability to remain calm in emergency situations; ability to stay focused; ability to deal with frequent interruptions.

Physical Demands:

Demonstrated mechanical aptitude and manual dexterity; ability to lift, kneel, climb stairs, ladders, work at heights, work in tight spaces, withstand hot and cold temperatures; wear personal protective equipment.

The above statements are intended to describe the general nature and level of the work being performed by people assigned to this job. They are not an exhaustive list of all duties and responsibilities associated with it.



THE UNIVERSITY OF CHICAGO
JOB DESCRIPTION

Signatures:

Employee's Signature

Date

Immediate Supervisor's Signature

Date

The University of Chicago is an Affirmative Action / Equal Opportunity Employer.

Last Updated: 02/03/10



THE UNIVERSITY OF CHICAGO
JOB DESCRIPTION

Rec'd. 5/13/10 from UoC

Specific Title: Utility Worker, ENVIRONMENTAL HEALTH AND SAFETY
Generic Title: Risk/Safety Professional
Division/Department: Risk Management, Audit and Safety
Reports to: Krista Cooley, Associate Director Environmental Health and Safety

General Summary:

Under direct supervision, assists in the implementation of the University's environmental health and safety programs to safeguard employees and ensure regulatory compliance. Conducts routine inspections of fire extinguishers, forklift log books, large assembly units, facilities and sprinkler control valves to ensure proper functioning and compliance with government health and safety laws and University policies and procedures. Coordinate annual fire pump testing and follow-up on any citation issues. Responds to emergency response situations (e.g., fire alarms, odor complaints, chemical spills) to serve in a support role. Issues hot work and red tag permits. Reviews and updates or creates evacuation route maps and fire department pre-plans. Compiles data and assists with preparing reports. Performs data entry and helps maintain required documentation.

Essential Functions:

45% Fire Extinguishers: Inspect fire extinguishers by electronic monitoring, when initially placed in service, at 30-day intervals thereafter, and at more frequent intervals when circumstances require. Conduct annual "tagging" of fire extinguishers as a City of Chicago licensed fire extinguisher serviceman. Make arrangements to charge, fill, maintain, recharge, refill, repair and test fire extinguishers with appropriate service provider. Establish and maintain a stock supply of fire extinguishers for immediate exchange in areas where extinguishers have been discharged and facilitate exchanges as needed.

Other Functions:

30% Inspections: Conduct general building inspections/re-inspections to ensure regulatory compliance with the Occupational Safety and Health Administration, City of Chicago Fire Prevention Bureau, and City of Chicago Building Department. Inspect all exit, stairway, fire escape and directional signs used to mark all ways of egress for illumination. Inspect all daily forklift inspection log books on a monthly basis. Report any deficiencies in log book records to the appropriate supervisor of Environmental Health and Safety. Serving as the Safety Warden for Environmental Health and Safety and conduct weekly fire/general safety review of all assembly units having a seating capacity of 300 persons or more. Creating, reviewing or updating emergency evacuation maps and fire department pre-plans.

5% Fire Pump Program: Coordinate, witness and track annual fire pump testing with Facilities Services, Campus and Residential Client Services, Residence Halls and Commons, Fire Prevention Bureau and service contractor for code compliance. When a test of any fire pump reveals a deficiency in any of the aforementioned conditions, coordinate immediate corrective action by submitting appropriate work requests. Conduct monthly inspections to ensure that water supply valves to the fire pump are secured in the open position with a sturdy chain and padlock consistent across campus



THE UNIVERSITY OF CHICAGO
JOB DESCRIPTION

to ensure compliance with the Fire Prevention Bureau and University's Insurance Company.

- 5% Emergency Lighting: Conduct periodic testing of emergency lighting equipment. Emergency lighting systems shall be tested in accordance with one of the following options:
- Functional testing shall be conducted at 30-day intervals for not less than 30 seconds;
 - Functional testing shall be conducted annually for not less than 1½ hours if the emergency lighting system is battery powered; and
 - The emergency lighting equipment shall be fully operational for the duration of the aforementioned tests.
- 5% Permits: Conduct site inspections for welding, cutting, brazing and issue hot work permits to University employees and outside contractors. Coordinate all campus fire alarm/suppression system shut-downs, make the appropriate notifications, and issue red tag permits.
- 5% Emergency Response: Conduct emergency response activities (e.g., responding to odor complaints, cleaning up chemical spills).
- 5% Other Duties: Perform other duties as assigned by the Director or Associate Director.

Qualifications:

Candidates must demonstrate the following competencies: manage interpersonal relationships and interact/communicate and provide excellent customer service with clarity, tact and courtesy to patrons, staff, faculty, students and others; communicate effectively in English, both orally and in writing; work on multiple projects simultaneously, set priorities and meet deadlines; exhibit excellent organizational skills; recognize and resolve or refer problems; ability to read and interpret instructions and regulations; ability to perform basic mathematical functions relevant to the position and have good problem-solving skills; work effectively with supervision and as a part of a team; ability to manage stressful situations; ability to work independently; use or learn a range of position-related software applications; demonstrated skill working with Adobe Acrobat Professional and Microsoft Word, Excel, Access and Outlook required; knowledge of EH&S Assist or a similar type of database; must be very detailed and accurate; must be able to consistently meet daily, weekly and monthly dead-lines.

High school diploma or equivalent required. Knowledge of Occupational Safety and Health Administration, City of Chicago Fire Prevention Bureau, and City of Chicago Building Department codes. Experience adhering to inspection schedules and conducting equipment inspections preferred. City of Chicago certification at the fire extinguisher serviceman level preferred or ability to obtain within one year. A current valid driver's license required.

Demonstrated mechanical aptitude and manual dexterity; ability to lift, kneel, climb stairs, ladders, work at heights, work in tight spaces, withstand hot and cold temperatures; wear personal protective equipment.



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The above statements are intended to describe the general nature and level of the work being performed by people assigned to this job. They are not an exhaustive list of all duties and responsibilities associated with it.

Mental Demands:

Ability to multi-task and manage multiple projects simultaneously; ability to work successfully with the University Community including students, faculty and staff; ability to work successfully with external organizations and individuals on behalf of the University; ability to work under pressure; verbal and written communication, and organizational skills; ability to problem solve; ability to remain calm in emergency situations; ability to stay focused; ability to deal with frequent interruptions.

Physical Demands:

See Qualifications.

Signatures:

Employee's Signature

Date

Immediate Supervisor's Signature

Date

The University of Chicago is an Affirmative Action / Equal Opportunity Employer.

Last Updated: 03/15/2010

ILD005421136



The University Of Chicago
Risk Management, Audit and Safety.
Environmental Health and Safety
6054 S. Drexel Avenue, Chicago, Illinois 60637

Steven Beaudoin
Director, Environmental Health and Safety

Phone: (773) 702-9999
Fax: (773) 702-6546
email: sbeaudoi@uchicago.edu

November 5, 2009

Re: Request for Information LR-8J, Dated October 5, 2009

Dear Ms. Sharrow:

The attached report contains requested information by the U.S. Environmental Protection Agency (EPA) under section 3007 of the Resource Conservation Recovery Act (RCRA) from the University of Chicago and the University of Chicago Hospital.

The following provides details to questions 1 through 5 by the U.S. EPA under Section 3007 of RCRA.

1. Identify all persons consulted in preparing the answers to this request for information provide the full name and titles for each person identified.
 - a. Steve Beaudoin, Director – University of Chicago's Environmental Health and Safety Office
 - b. Krista Cooley, Associate Director - University of Chicago's Environmental Health and Safety Office;
 - c. Melissa Jackson, Industrial Hygienist - University of Chicago's Environmental Health and Safety Office;
 - d. Mike Wilk, Hazardous Waste Contractor - Wilpen Environmental Services, Inc.; and
 - e. Joe Sapienza, Hazardous Waste Contractor – Wilpen Environmental Services, Inc.
2. Provide a copy of all hazardous waste manifest from 2007 to present prepared for each of the following facilities, EPA Identification Numbers, and/or addresses:
 - ILD005421136 – 960 E. 58th St., Chicago, IL
 - ILD005514778 – 10910 S. Langley Ave., Chicago, IL
 - ILR000114512 – 5619 S. Cottage Grove Ave., Chicago, IL
 - ILR000124008 – 5540 S. Hyde Park Ave., Chicago, IL

- ILR000124016 – 5445 Ingleside Ave., Chicago, IL
- ILR00012404 – 5454 S. Shore Dr., Chicago, IL
- ILR000129106 – 1027 E. 57th St., Chicago, IL
- ILR000146787 – 1369 E. Hyde Park Ave., Chicago, IL
- ILR000143750 – 5740 S. Woodlawn, Chicago, IL

900 E. 58th St., Chicago, IL
 920 E. 58th St., Chicago, IL
 5525 S. Ellis Ave., Chicago, IL
 5555 S. Ellis Ave., Chicago, IL
 5734 S. Ellis Ave., Chicago, IL
 5735 S. Ellis Ave., Chicago, IL
 5801 S. Ellis Ave., Chicago, IL
 58th St. & Ellis Ave., Chicago, IL
 57th St. & Ellis Ave., Chicago, IL
 924 E. 57th St., Chicago, IL
 5620 S. Stoney Island, Chicago, IL
 60th and Blackstone Ave., Chicago, IL

Hazardous waste manifests for 2007 to present with the EPA identification number ILD005421136 are located on the CD-ROM labeled as “University of Chicago 2007-2009 Hazardous Waste Manifests – EPA ID# ILD005421136” provided with response letter.

Please note that there are some discrepancies in the addresses listed above in regards to being used as hazardous waste generators or storage facilities. Please see the explanation of each property and the discrepancies associated with them.

- ILD005421136 – 960 E. 58th St., Chicago, IL
 - o The University of Chicago (including the University of Chicago Hospitals) uses the EPA identification number ILD005421136 for all hazardous waste manifests, but the address is incorrect. The central accumulation area for all hazardous waste materials for the University of Chicago (including the University of Chicago Hospitals) is 6049 S. Blackstone Avenue.
- ILD005154778 – 10910 S. Langley Ave., Chicago, IL
 - o 10910 S. Langley Ave., Chicago, IL is an offsite vacant building owned by the University of Chicago. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.
- ILR000114512 – 5619 S. Cottage Grove Ave., Chicago, IL
 - o 5619 S. Cottage Grove Ave., Chicago, IL is currently a vacant residential property. The University has no hazardous waste

manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.

- ILR000124008 – 5540 S. Hyde Park Ave., Chicago, IL
 - o 5540 S. Hyde Park Ave., Chicago, IL is a campus dormitory. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.
- ILR000124016 – 5445 Ingleside Ave., Chicago, IL
 - o 5445 Ingleside Ave., Chicago, IL a campus dormitory. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.
- ILR000124024 – 5454 S. Shore Dr., Chicago, IL
 - o 5454 S. Shore Dr., Chicago, IL is no longer owned or occupied by the University of Chicago. When the University of Chicago occupied this building, it was used to house students. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.
- ILR000129106 – 1027 E. 57th St., Chicago, IL
 - o 1027 E. 57th St., Chicago, IL is the University of Chicago's Anatomy Building (Laboratories) that generates hazardous waste, but is not used as a central accumulation area. All hazardous waste generated from this address is transported to the University of Chicago's central accumulation area located at 6049 S. Blackstone Ave., using EPA ID number ILD005421136.
- ILR000146787 – 1369 E. Hyde Park Ave., Chicago, IL
 - o 1369 E. Hyde Park Ave., Chicago, IL is residential property owned and operated by the University of Chicago. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.

- ILR000143750 – 5740 S. Woodlawn Ave., Chicago, IL
 - o 5740 S. Woodlawn Ave., Chicago, IL is a nursery school owned and operated by the University of Chicago. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.

- 900 E. 58th St., Chicago, IL
 - o 900 E. 58th St., Chicago, IL is a part of the University of Chicago Hospital that generates hazardous waste, but is not used as a central accumulation area. All hazardous waste generated from this address is transported to the University of Chicago's central accumulation area located at 6049 S. Blackstone Ave., using EPA ID number ILD005421136. .

- 920 E. 58th St., Chicago, IL
 - o 920 E. 58th St., Chicago, IL is the University of Chicago's Cumming Life Science Building (Laboratories) that generates hazardous waste, but is not used as a central accumulation area. All hazardous waste generated from this address is transported to the University of Chicago's central accumulation area located at 6049 S. Blackstone Ave., using EPA ID number ILD005421136.

- 5525 S. Ellis Ave., Chicago, IL
 - o 5524 S. Ellis Ave., Chicago, IL is a parking structure owned by the University of Chicago. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.

- 5555 S. Ellis Ave., Chicago, IL
 - o 5555 S. Ellis Ave., Chicago, IL is an office building operated and owned by the University of Chicago. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.

- 5734 S. Ellis Ave., Chicago, IL
 - o 5734 S. Ellis Ave., Chicago, IL is the University of Chicago's Henry Hinds Laboratory for Geophysical Sciences that generates hazardous waste, but is not used as a central accumulation area. All hazardous waste generated from this address is transported to the University of Chicago's central

accumulation area located at 6049 S. Blackstone Ave., using EPA ID number ILD005421136.

- 5735 S. Ellis Ave., Chicago, IL
 - o 5735 S. Ellis Ave., Chicago, IL is the University of Chicago's Searle Chemistry Laboratory that generates hazardous waste, but is not used as a central accumulation area. All hazardous waste generated from this address is transported to the University of Chicago's central accumulation area located at 6049 S. Blackstone Ave., using EPA ID number ILD005421136.
- 5801 S. Ellis Ave., Chicago, IL
 - o 5801 S. Ellis Ave., Chicago, IL is the University of Chicago's Administration Building. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.
- 58th St. and Ellis Ave., Chicago, IL
 - o 58th St. and Ellis Ave., Chicago, IL is an intersection where the University of Chicago's Bookstore and Administration Building is located. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.
- 57th St. and Ellis Ave., Chicago, IL
 - o 57th St. and Ellis Ave., Chicago, IL is an intersection where the University of Chicago's Snell-Hitchcock building (dormitory), Kersten Building (Physical Science Building), Research Institute Building (Physical Science Building) and Regenstein Library is located. Regenstein Library and Snell-Hitchcock do not generate or store any hazardous waste. The Kersten and the Research Institute buildings do generate hazardous waste, but are not used as central accumulation areas. All hazardous waste generated from these addresses is transported to the University of Chicago's central accumulation area located at 6049 S. Blackstone Ave., using EPA ID number ILD005421136.
- 924 E. 57th St., Chicago, IL
 - o 924 E. 57th St., Chicago, IL is the University of Chicago's Biological Science Learning Center that generates hazardous waste, but is not used as a central accumulation area. All hazardous waste generated from this address is transported to

the University of Chicago's central accumulation area located at 6049 S. Blackstone Ave., using EPA ID number ILD005421136.

- 5620 S. Stony Island, Chicago, IL
 - o 5620 S. Stony Island, Chicago, IL is the ATS Services Building and parking lot owned and occupied by the University of Chicago. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.
- 60th and Blackstone Ave., Chicago, IL
 - o 60th and Blackstone Ave., Chicago, IL is an intersection where the University of Chicago's Press Building is located. The University has no hazardous waste manifest relating to the property at this address. To the best of its knowledge, the University has conducted no activity during the period requested which would require the generation of a hazardous waste manifest.

3. Provide a narrative explanation of the following:

- a. The type(s) and amounts of hazardous waste generated at the University of Chicago, including the University of Chicago Hospitals.

The University of Chicago (including the University of Chicago Hospital) generates listed and characteristic hazardous waste and such hazardous waste amounts are identified on the manifests; see complete copies attached hereto in response to request #2.

- b. Where and how the hazardous waste generated at the University of Chicago, including the University of Chicago Hospitals, is collected.

The University of Chicago's (including the University of Chicago Hospital) hazardous waste contractor, Wilpen Environmental Services, Inc. collects hazardous waste weekly at each laboratory on campus that requests a pick-up and other locations (i.e., maintenance/trade shops) that may generate hazardous waste. The hazardous waste that is collected by Wilpen Environmental Services, Inc. is packaged in containers with absorbents and placed in secondary containers located on their carts.

- c. How the hazardous waste generated at the University of Chicago, including the University of Chicago Hospital, is transported from point of generation to storage.

Wilpen Environmental Services, Inc., the University of Chicago's (including the University of Chicago Hospital) hazardous waste contractor transports all hazardous waste from point of generation to their truck via carts. Waste bottles and containers are placed into secondary containers on the carts. The truck, which is operated by a CDL licensed driver with Hazmat endorsement and in accordance with U.S. DOT regulations, transports the hazardous waste to the University of Chicago onsite central accumulation area.

- d. Who transports the hazardous waste generated at the University of Chicago, including the University of Chicago Hospital, from point of generation to storage.

Wilpen Environmental Service, Inc. transports the hazardous waste from point of generation to storage. Wilpen's employees are RCRA trained and certified.

- e. The location, address and telephone numbers of all hazardous waste storage locations at the University of Chicago, including the University of Chicago Hospital.

The University of Chicago Lab Services Building (the central accumulation area) is located on the far southeast side of the university campus. The address is 6049 S. Blackstone Ave., Chicago, IL 60637 and phone number is (773)8342482.

- 4. Provide a copy of the Contingency Plans or emergency procedures for all of the hazardous waste facilities listed in response to request 1 through 3.

See attached Appendix A.

- 5. Provide a list of all facility personnel with hazardous waste management and contingency plan duties or responsibilities.

- a. Steve Beaudoin, Director - University of Chicago's Environmental Health and Safety Office;
- b. Krista Cooley, Associate Director - University of Chicago's Environmental Health and Safety Office;
- c. Mike Wilk, Hazardous Waste Contractor - Wilpen Environmental Services, Inc.; and
- d. Joe Sapienza, Hazardous Waste Contractor - Wilpen Environmental Services, Inc.

6. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

11/05/09
Date

Steve Brandon
Signature of Corporate Officer and Title

Attachment A

Attachment A provides a copy of the University of Chicago's Contingency Plan for the Laboratory Services Building (hazardous waste facility) located at 6049 S. Blackstone Ave., Chicago, IL 60637.

Appendix A



The University Of Chicago
Risk Management, Audit and Safety.
Environmental Health and Safety
6054 South Drexel Avenue, Chicago, Illinois 60637

Laboratory Service Building Contingency Plan

Facility Name: Laboratory Service Building
Location: 6041 South Blackstone Avenue, Chicago, Illinois
Operator: The University of Chicago

1. General information

Laboratory Service Building is a receiving point for waste chemicals from research and teaching laboratories of the University of Chicago and the University of Chicago Medical Center. Chemicals are received at the facility, sorted and segregated, and stored until a disposal contractor comes on-site to lab pack them. Chemicals are normally received in original containers; usually glass or plastic bottles ranging in size from a few ounces to approximately one gallon. Flammable chemicals may be consolidated into 55-gallon drums for ease of storage and disposal.

The building is a one-story masonry structure without attachment to any other buildings. It is remotely located on the far southeast side of the university campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue.

The building occupies an area of 31 feet by 38 feet with finished concrete floor. To the east side of the building there is a fenced yard with a concrete patio. Inside the building it is subdivided into several areas (rooms), including a laboratory, to store chemicals of the same compatibility (flammable, reactive, toxic, and corrosive) and each room is labeled as such. The floor plan and designation of each area is shown on map.

2. Emergency Coordinators

Primary Coordinator: Steven Beaudoin
Director Environmental Health and Safety
115 Denell Drive
Crete, Illinois 60417
Office Phone: 773-702-9999
Home Phone: 708-672-6975

Alternate Coordinator: Krista Cooley
Associate Director Environmental Health and Safety
79 Oak Tree Drive
Valparaiso, Indiana 46383
Office Phone: 773-702-9999
Home Phone: 219-462-8592

Duties of Emergency Coordinators:

- Providing a "On-Call" Safety Officer twenty-four hours a day, seven days a week;
- Responding with appropriate action to control and remedy the incident;
- Responding to a reported incident in a timely manner;
- Maintaining liaison with the local Police and Fire Departments;
- Notifying Administration of an incident and providing periodic status reports;
- Reviewing and amending the Emergency Response Plan for Hazardous Materials; and
- Taking post-emergency measures to prevent reoccurrences of the incident.

3. Notification

When fire, explosion, or any unexpected release occurs, the facility operator or personnel should immediately:

- Notify other personnel in the building by voice. The facility is small enough that a voice amplification system is not required;
- Notify University Police by dialing 123 from a campus phone or 702-8181 from a non-campus phone;
- Notify emergency coordinator(s) listed on page 1.

4. Control Procedures

1. City Fire Department will respond immediately to any fire, explosion or release of hazardous materials. The Fire Department will contain and control any fire involved at the facility with the assistance of the emergency coordinator. Spill releases will be controlled through use of absorbent material such as vermiculite and spill control pillows.
2. Spill material with the absorbent will be picked up and placed in appropriate storage containers for disposal through the University of Chicago's waste disposal contractor. The facility operator will remove all waste from the spill area for ease of clean-up. The facility will not accept new waste until the spill or leak has been cleaned up and controlled.
3. All equipment and containers will be decontamination or replaced prior to resuming normal operation in the Laboratory Service Building following conclusion of emergency response and clean-up procedures.

5. Emergency Equipment

An emergency shower and eyewash are located by the doorway leading from the office/chemical sorting area, room 108, to the storage rooms. (See Figure 3 attached)

Two Class ABC fire extinguishers are located in the office/chemical sorting room and one Class D fire extinguisher is located in the hallway between the storage rooms. The facility is equipped with a smoke detector system that alarms directly at the Campus Police Department. Extinguishers are intended for use by staff during fire emergencies. These devices are needed to warn occupants of a fire and to summon the fire department.

Appendix A

Laboratory coats, face shields, and rubber gloves are located in the chemical sorting area. Neutralizers, absorbent material, safety goggles, scoops, base control, are located in the storage cabinets located adjacent to, across from and under the fume hood. These materials are necessary to ensure the safety of staff working in the facility during normal or emergency situations.

6. Evacuation Plan

Evacuation of the facility will be initiated by voice signal to personnel inside. Evacuation from the area will be made by Dorchester Avenue north to Midway Plaisance. Alternate evacuation route would be to go south on Dorchester Avenue.

7. Coordination Agreement Arrangements

The University of Chicago maintains its Police Department and medical facility (The University of Chicago Medical Center). Arrangements have been made with the following response teams in case of an emergency. Copies of this Contingency Plan were sent to each agency.

- University of Chicago Police Department
5555 South Ellis Avenue
Phone: 702-8181
- The University of Chicago Medical Center
Emergency Care
Bernard Mitchell Hospital, 901 East 58th Street
Phone: 702-6250
- City of Chicago Police Department
District Commander
1121 South State Street
Chicago, Illinois
Phone: 744-4000
- City of Chicago Fire Department
District Chief
5955 South Ashland Avenue
Chicago, Illinois 60636
Phone: 747-5017
- City of Chicago Fire Department
Hazardous Materials Chief
558 West DeKoven Street
Chicago, Illinois 60607
Phone: 747-6582

8. Required Reports

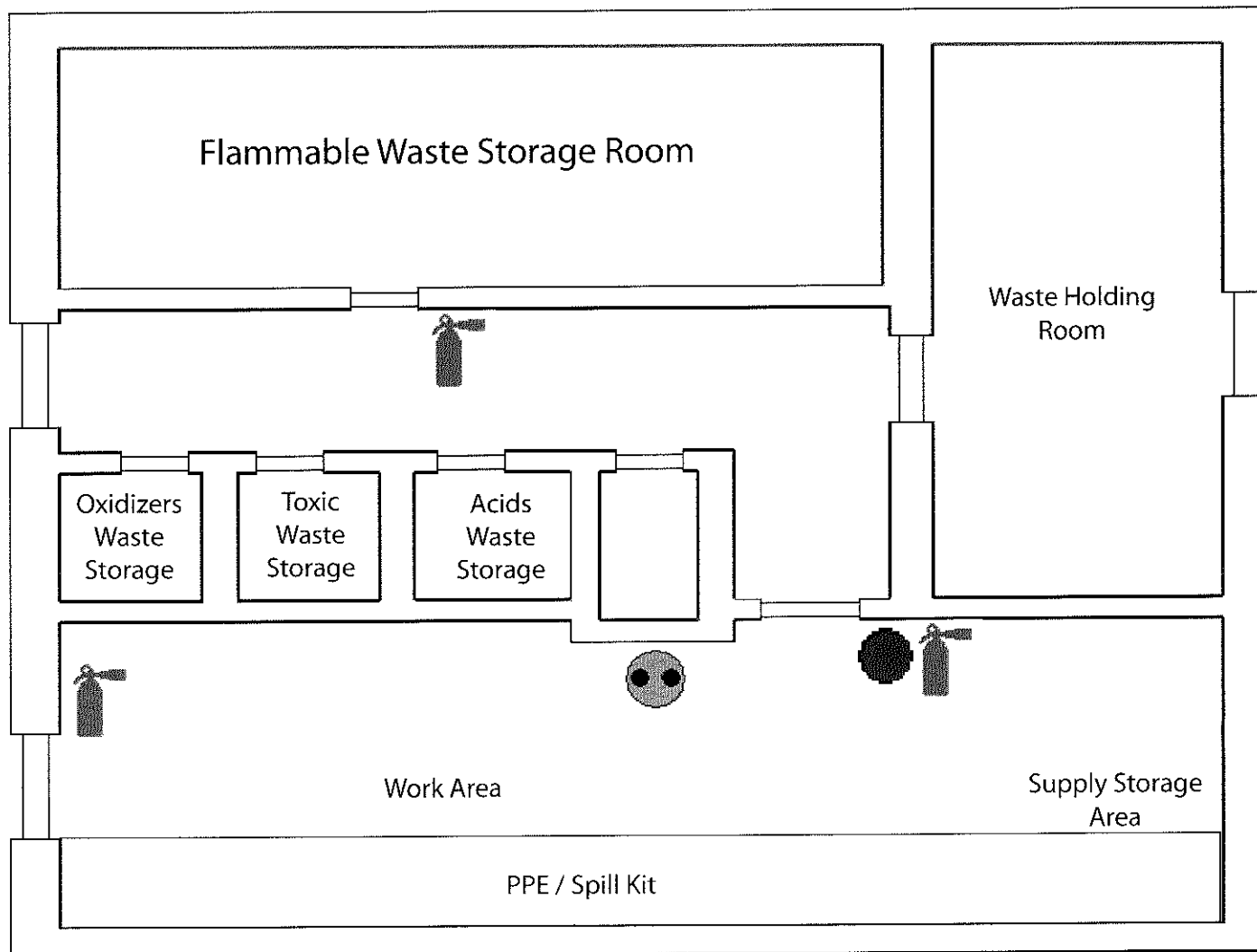
A follow-up report detailing the incident, emergency response, clean-up, and actions taken to prevent reoccurrence will be prepared and submitted to the Illinois Environmental Protection Agency within 15 days of occurrence. All records concerning the incident and report will be maintained by the facility operator until three years after final closure of the Laboratory Service Building.







University of Chicago

Laboratory Services Building

6049 South Blackstone Avenue
Chicago, IL 60637



 NORTH	
	Emergency Shower Location
	Emergency Eyewash Location
	Fire Extinguisher Location
*Building equipped with security alarm.	

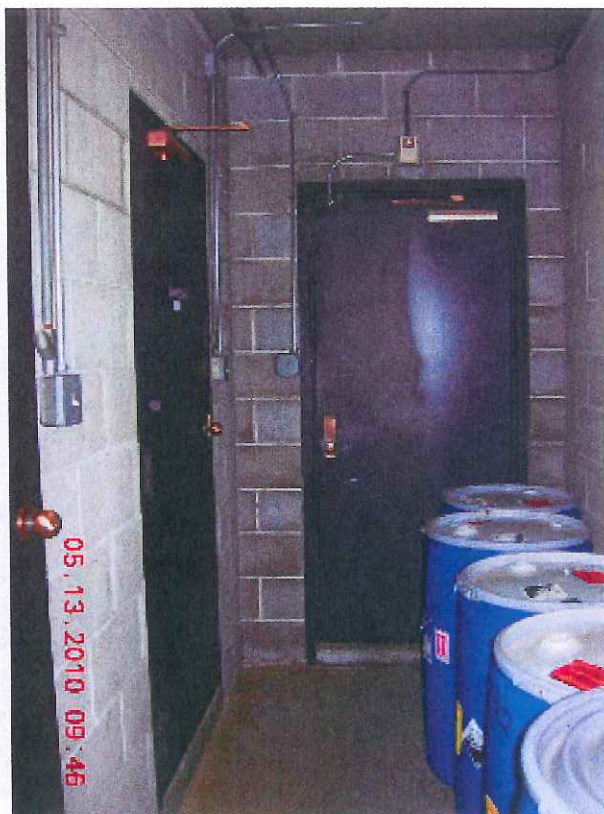
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN0884.JPG
Date/Time 5/13/2010
9:46:08 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Internal central hall facing west -
exit door (note absence of exit sign).



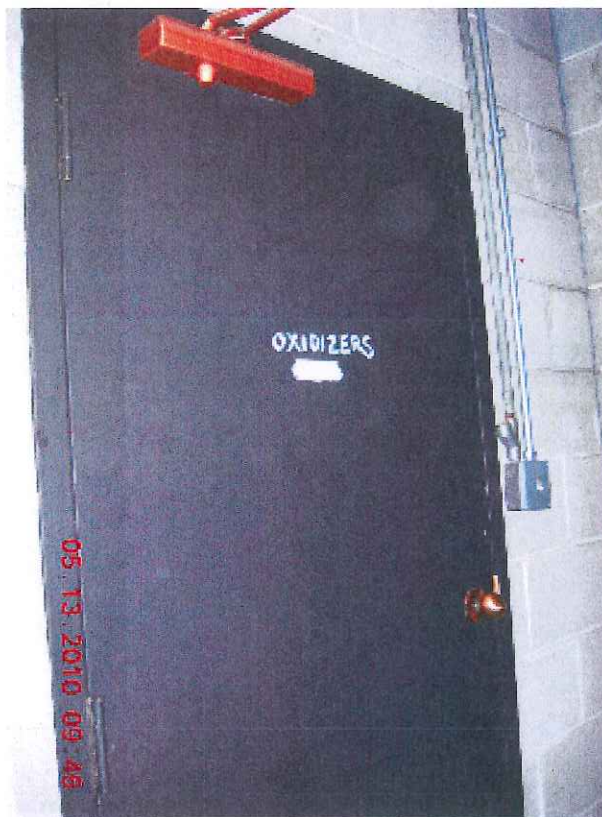
Photographs for University of Chicago

Media: RCRA

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Photo Filename DSCN0885.JPG
Date/Time 5/13/2010
9:46:20 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Exterior Door of Oxidizers
Waste Storage.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN0886.JPG
Date/Time 5/13/2010
9:46:30 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Oxidizers Waste
Storage Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 4
Photo Filename DSCN0887.JPG
Date/Time 5/13/2010
9:46:40 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Exterior Door of Toxic Waste
Storage Room.



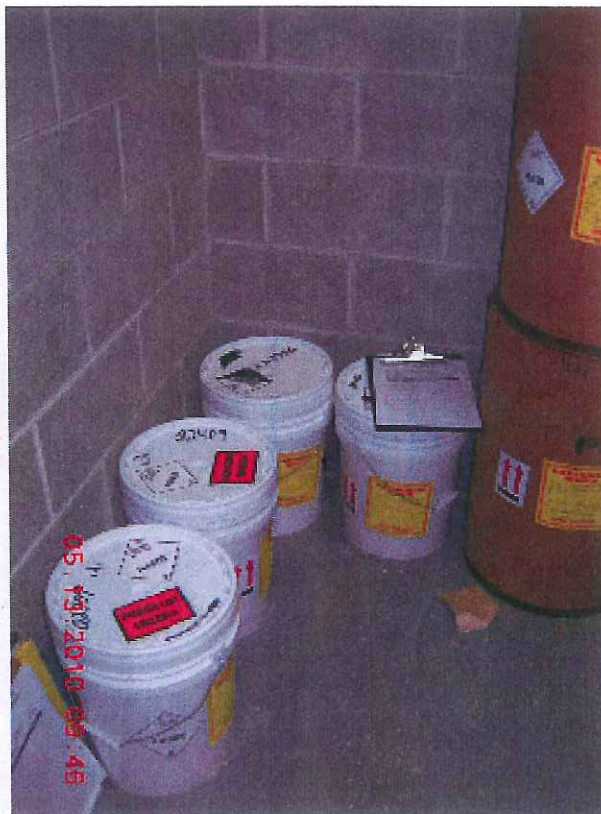
Photographs for University of Chicago

Media: RCRA

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Photo Number 5
Photo Filename DSCN0888.JPG
Date/Time 5/13/2010
9:46:46 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Toxics Waste Storage
Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 6
Photo Filename DSCN0889.JPG
Date/Time 5/13/2010
9:46:58 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building -Interior of Toxics Waste Storage
Room.



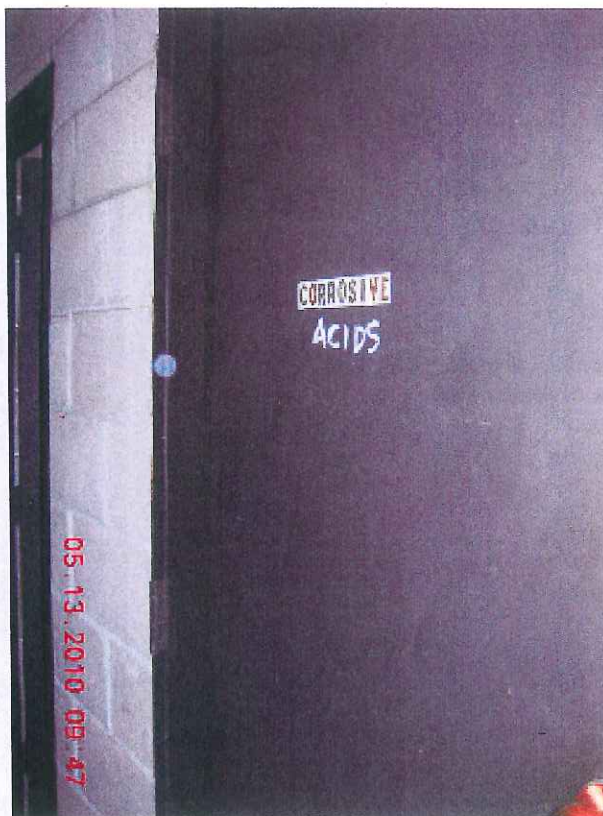
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN0890.JPG
Date/Time 5/13/2010
9:47:08 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Exterior Door of Acids /
Corrosives Waste Storage Room.



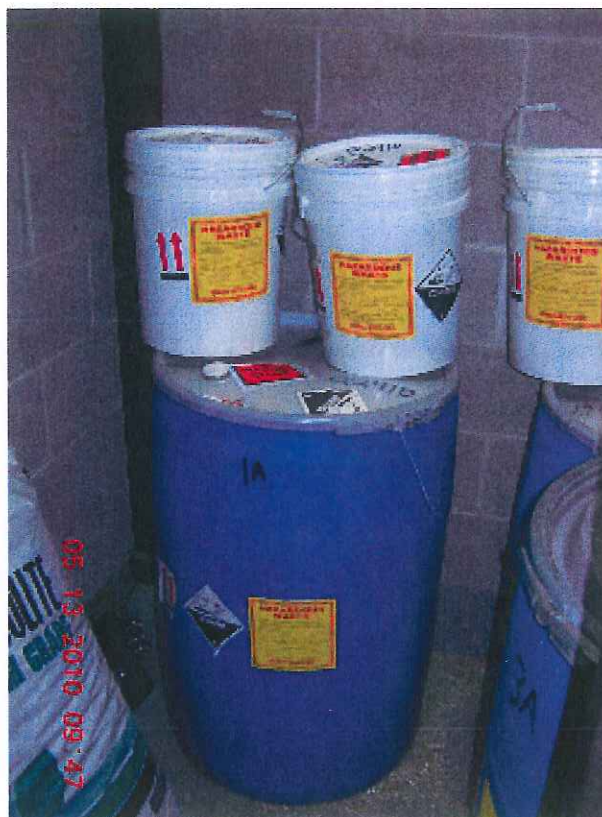
Photographs for University of Chicago

Media: RCRA

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Date/Time 5/13/2010
9:47:16 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Acids / Corrosives
Waste Storage Room.



Photographs for University of Chicago

Media: RCRA

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Date/Time 5/13/2010
9:47:22 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Acids / Corrosives
Waste Storage Room.



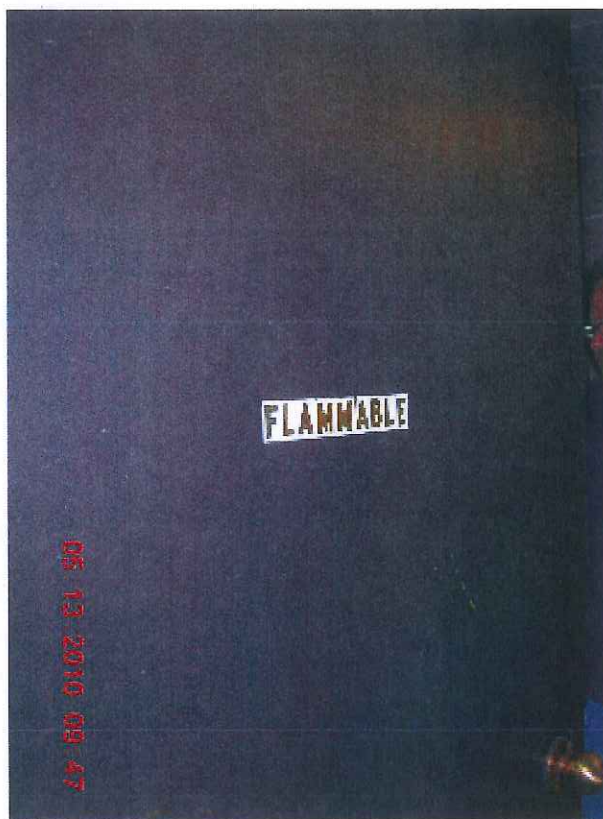
Photographs for University of Chicago

Media: RCRA

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Photo Filename DSCN0893.JPG
Date/Time 5/13/2010
9:47:30 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Exterior Door of Flammable
Waste Storage Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 11
Photo Filename DSCN0894.JPG
Date/Time 5/13/2010
9:47:50 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Flammable Waste
Storage Room facing west.



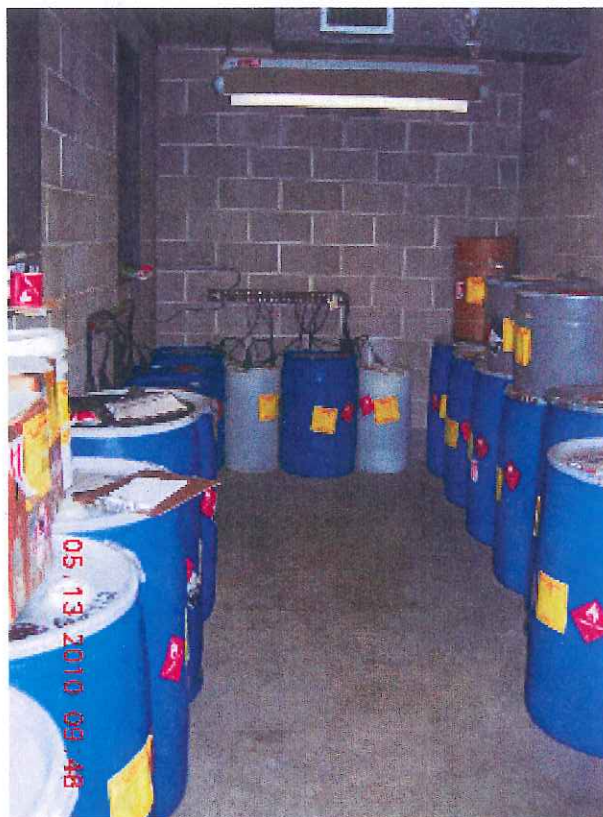
Photographs for University of Chicago

Media: RCRA

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9:48:02 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Flammable Waste
Storage Room facing east.



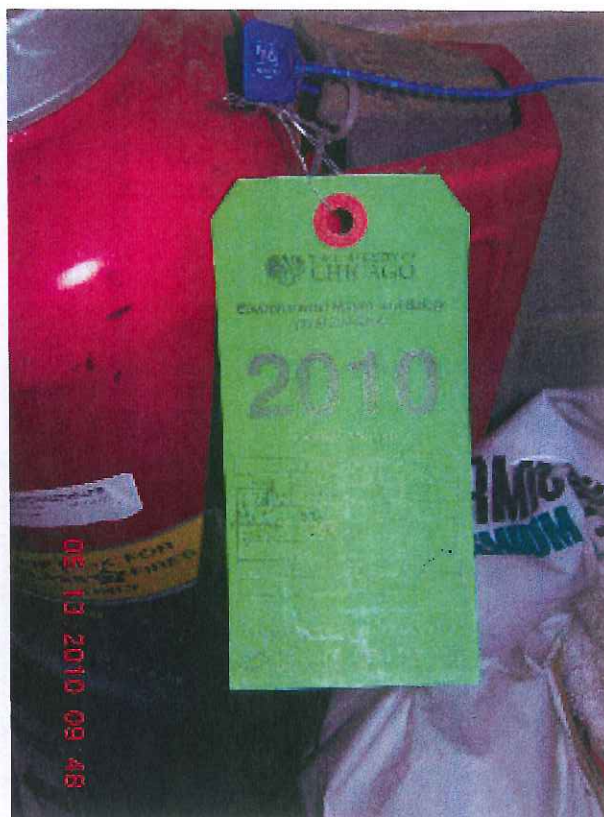
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 13
Photo Filename DSCN0896.JPG
Date/Time 5/13/2010
9:48:18 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior fire extinguisher service
tag.



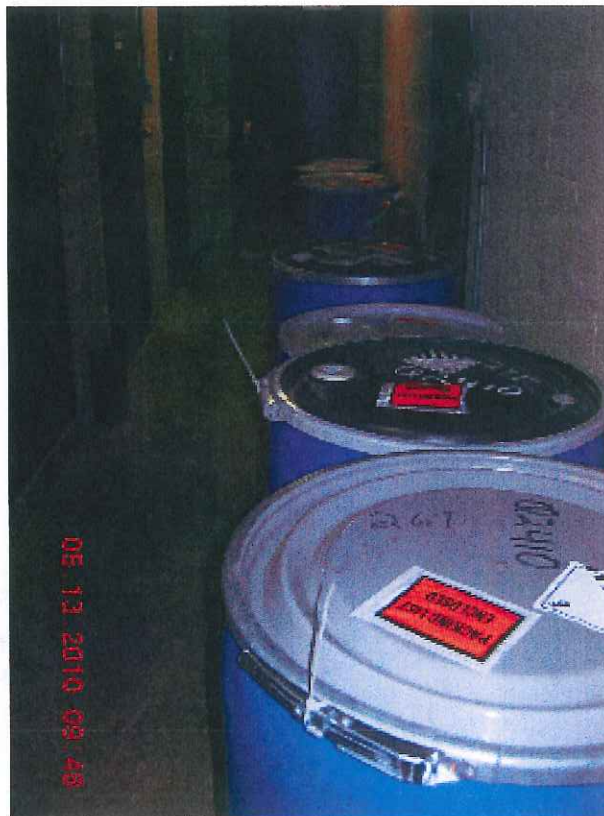
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 14
Photo Filename DSCN0897.JPG
Date/Time 5/13/2010
9:48:30 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior Hall - facing east -
excess Flammable Waste Storage.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 15
Photo Filename DSCN0898.JPG
Date/Time 5/13/2010
9:48:46 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Interior of Work Area facing
west to exit door - excess storage.



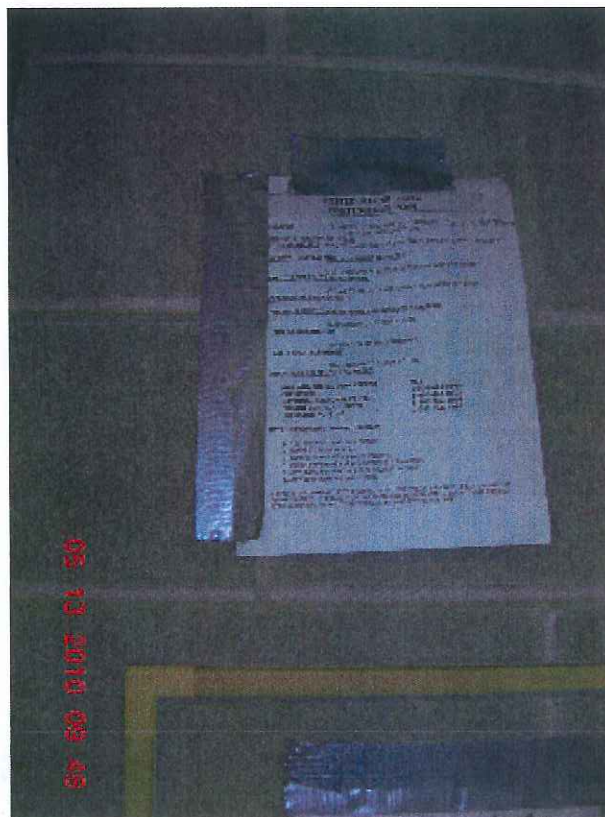
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 16
Photo Filename DSCN0899.JPG
Date/Time 5/13/2010
9:48:52 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Wilpen Emergency Information
on north wall of Work Area.



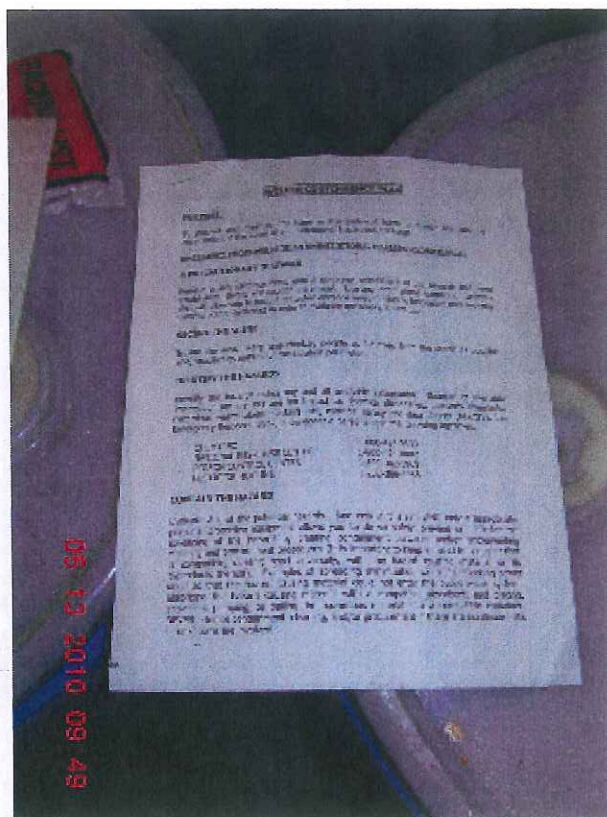
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 17
Photo Filename DSCN0901.JPG
Date/Time 5/13/2010
9:49:18 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Wilpen Emergency Information
in Work Area Page 1.



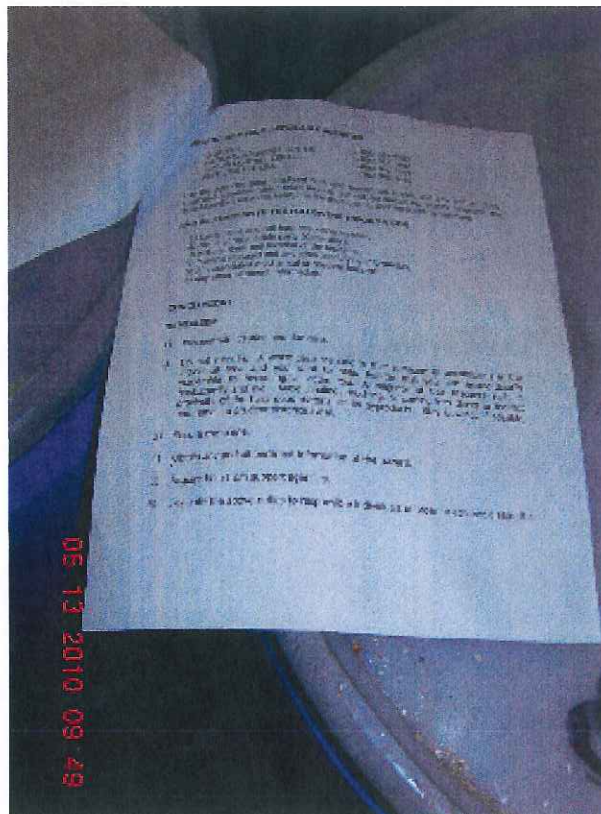
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 18
Photo Filename DSCN0902.JPG
Date/Time 5/13/2010
9:49:24 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Wilpen Emergency Information
in Work Area Page 2.



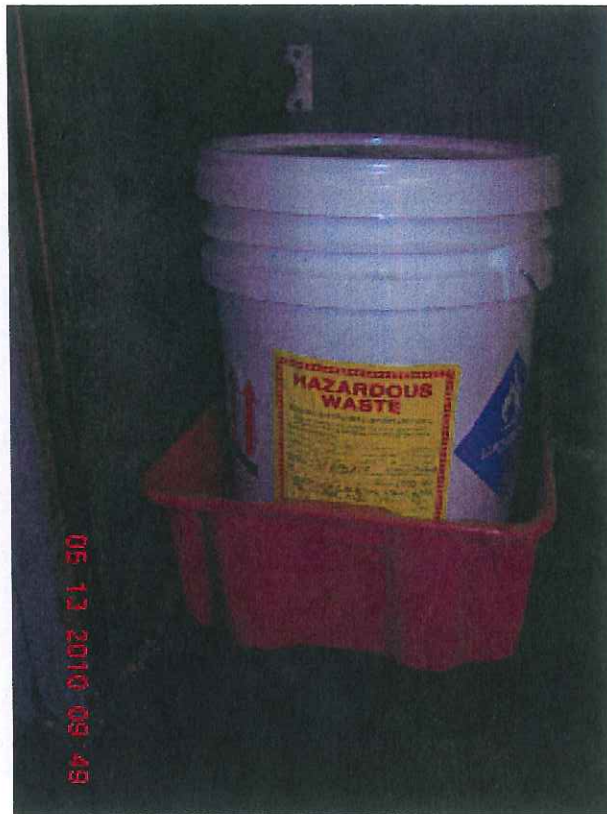
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 19
Photo Filename DSCN0904.JPG
Date/Time 5/13/2010
9:50:00 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Water reactive waste in
northwest corner of Work Area.



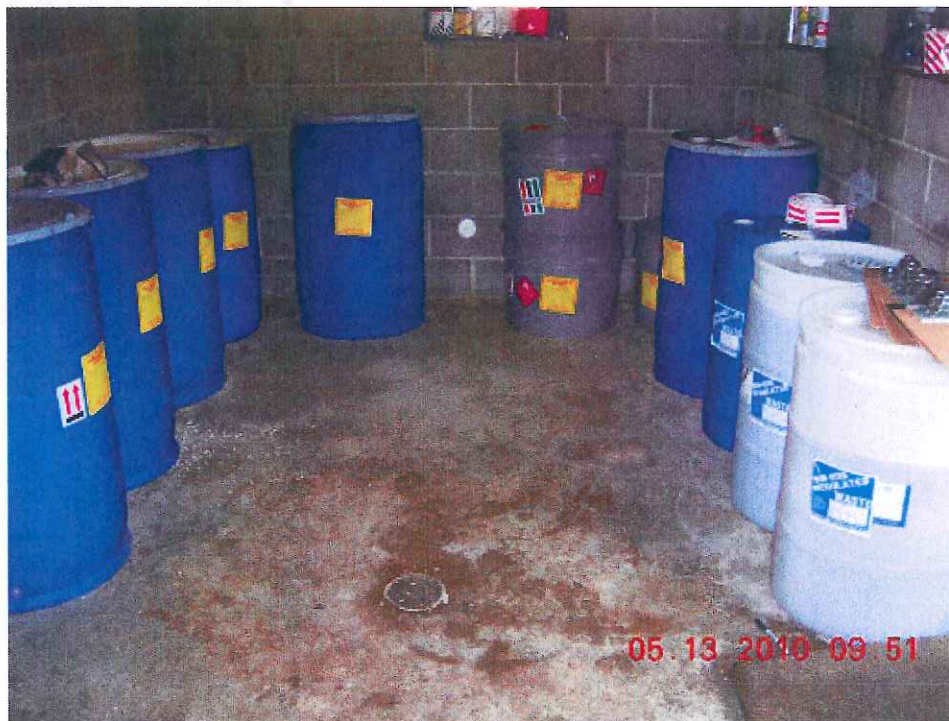
Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 20
Photo Filename DSCN0905.JPG
Date/Time 5/13/2010
9:51:26 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Waste Holding Room facing
south.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 21
Photo Filename DSCN0906.JPG
Date/Time 5/13/2010
9:51:36 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Waste Holding Room facing
north.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 22
Photo Filename DSCN0907.JPG
Date/Time 5/13/2010
9:56:04 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Eastern exterior of building with
door open to Waste Holding Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 23
Photo Filename DSCN0908.JPG
Date/Time 5/13/2010
9:56:24 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Eastern exterior of building with
door open to Waste Holding Room.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 24
Photo Filename DSCN0909.JPG
Date/Time 5/13/2010
9:57:24 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services Building - Western exterior of building with door to Work Area. Note address is 6041 and not 6049?



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 25
Photo Filename DSCN0910.JPG
Date/Time 5/13/2010
10:02:34 AM
Photographer Diane Sharrow

Description

University of Chicago, Laboratory Services
Building - Western exterior of building.



Photographs for University of Chicago

Media: RCRA

Disk Number 1
Photo Number 26
Photo Filename DSCN0911.JPG
Date/Time 5/13/2010
10:02:44 AM
Photographer Diane Sharrow

Description

University of Chicago - Signage and gate to south of the Laboratory Services Building.



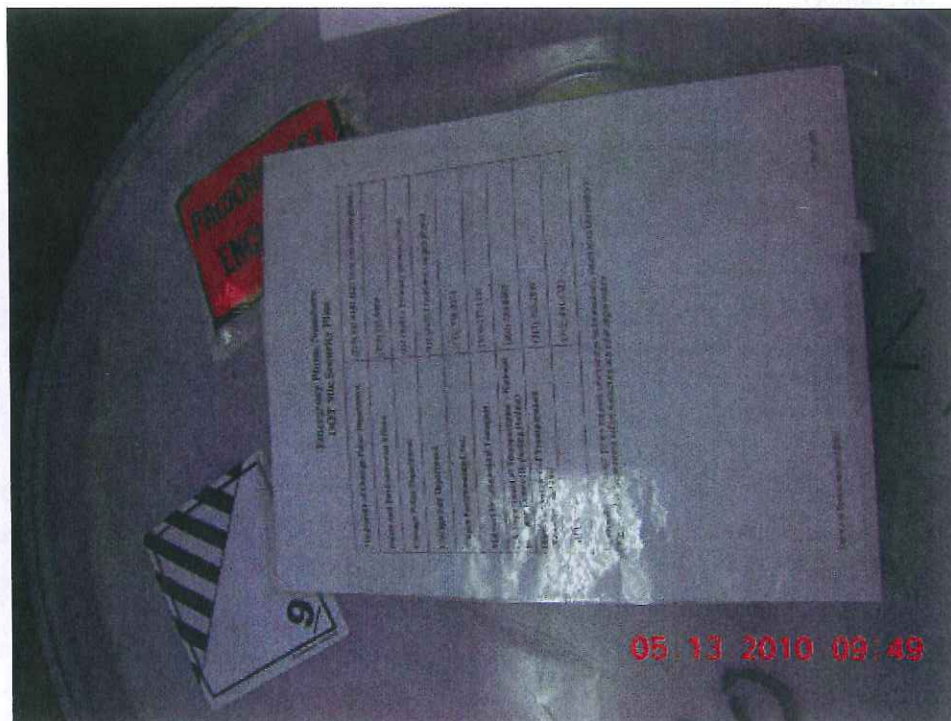
Photographs for University of Chicago

Media: RCRA

Disk Number 2
Photo Number 27
Photo Filename DSCN0900.JPG
Date/Time 5/13/2010
9:49:12 AM
Photographer Diane Sharrow

Description

Univeristy of Chicago, Laboratory Services
Building - Wilpen Emergency Information



Photographs for University of Chicago

Media: RCRA

Disk Number 2
Photo Number 28
Photo Filename DSCN0903.JPG
Date/Time 5/13/2010
9:49:40 AM
Photographer Diane Sharrow

Description

Univeristy of Chicago, Laboratory Services
Building - Interior of Work Area facing
east - excess storage.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DEC 01 2004

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Steven Beaudoin,
Director, Safety and Environmental Affairs
University of Chicago
5555 S. Ellis Avenue
Chicago, IL 60637

Re: Notice of Violation
EPA I.D. No.: ILD 005 421 136

Dear Mr. Beaudoin:

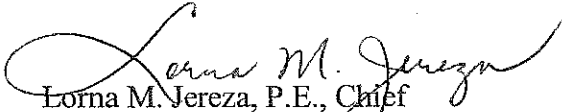
On October 26, 2004, the United States Environmental Protection Agency (U.S. EPA) issued the University of Chicago, a Notice of Violation (NOV) which identified violations of:

- 1) 35 IAC § 722.140(a) [40 CFR § 262.40(a)];
- 2) 35 IAC § 725.273(a) [40 CFR 265.173(a)];
- 3) 35 IAC § 722.134(a)(2) [40 CFR § 262.34(a)(2)];
- 4) 35 IAC § 725.152(d) [40 CFR § 265.52(d)];
- 5) 35 IAC § 725.152(e) [40 CFR § 265.52(e)];
- 6) 35 IAC § 725.154(d) [40 CFR § 265.54(d)];
- 7) 35 IAC § 725.273(a) [40 CFR § 265.173(a)];
- 8) 35 IAC § 722.134(c)(1)(B) [40 CFR § 262.34(c)(1)(ii)];
- 9) 35 IAC § 725.116(d)(1) [40 CFR 265.16(d)(1)]; and
- 10) 35 IAC §§ 703.121(a),(b), 703.180(c), 705.121(a).

U.S. EPA received University of Chicago's response to this NOV dated November 5, 2004. This letter is to inform you that U.S. EPA has reviewed University of Chicago's response and determined that no further enforcement action will be taken at this time. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. University of Chicago's hazardous waste management operations will continue to be evaluated by U.S. EPA and the Illinois Environmental Protection Agency in the future.

If you have any questions and/or concerns regarding this matter, please contact Todd C. Brown, of my staff, at (312) 886-6091.

Sincerely,



Lorna M. Jereza, P.E., Chief
Compliance Section 1

Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

cc: Todd Marvel, Illinois EPA



Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☒ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

Facility Name : University of Chicago

Facility Location: 960 E. 58th Street

City: Chicago State: IL

U.S. EPA ID# ILD 005 421 136

Assigned Staff Todd Brown Phone: (312)886-6091

Name	Signature	Date
Author	<i>Todd Brown</i>	<i>11/29/04</i>
Regional Counsel		
Section Chief	<i>Karen M. Jones</i>	<i>11/30/04</i>
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

OCT 26 2004

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Steven Beaudoin,
Director
Offices of Safety, Environmental Affairs
and Radiation Safety
University of Chicago
5555 South Ellis Avenue
Chicago, IL 60637

Re: Notice of Violation
University of Chicago
EPA Id No.: ILD 005 421 136

Dear Mr. Beaudoin:

On August 26-27, 2004, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected the University of Chicago located in Chicago, Illinois. The purpose of the inspection was to evaluate University of Chicago's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on information provided by University of Chicago personnel, review of records, and personal observations made by the inspector at the time of the investigation, the U.S. EPA has determined that University of Chicago is engaged in the storage of hazardous waste without a permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage permit, University of Chicago must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c) [40 CFR § 262.34(a), (c)]. We find that University of Chicago was in noncompliance with the following conditions for a storage permit exemption, and in violation of the following requirements:

1. A generator must keep a copy of each manifest signed in accordance with 35 IAC § 722.123(a) [40 CFR 262.23(a)] for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. See, 35 IAC § 722.140(a) [40 CFR § 262.40(a)]. At the time of the inspection, University of Chicago only had manifests on file that dated back to August 12, 2002. University of Chicago therefore violated the above-referenced generator requirement.
2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using containers to store hazardous waste must always keep those containers closed during storage, except when it is necessary to add or remove waste. See, 35 IAC §§ 722.134(a)(1)(A), and 725, Subpart I, § 725.273(a) [40 CFR §§ 262.34(a)(1)(i); 40 CFR part 265, Subpart I, § 265.173(a)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under 35 IAC § 725.273(a) [40 CFR § 265.173(a)]. At the time of the inspection, one 55-gallon container of lab-packed hazardous waste stored in the Flammable Storage Rm at the Laboratory Services Building was not completely closed. University of Chicago therefore failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility container requirement. U.S. EPA acknowledges that this violation was corrected at the time of the inspection.
3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using containers to store hazardous waste must ensure that the date upon which each period of accumulation begins is clearly marked *and visible* for inspection on each container (*emphasis added*). See, 35 IAC § 722.134(a)(2) [40 CFR 262.34(a)(2)]. At the time of the inspection, several containers of chloroform hazardous waste (D022) were stored in the "staging area" at the Laboratory Services Building. The containers were stored on top of other 55-gallon containers of waste, against a wall, with their labels facing the wall. Therefore, their accumulation dates were not visible for inspection. University of Chicago therefore failed to comply with the above-mentioned condition for a storage permit exemption. U.S. EPA acknowledges that this violation was corrected at the time of the inspection.
4. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator in the facility's contingency plan, and this list must be kept up to date. See, 35 IAC §§ 722.134(a)(4), and 725, Subpart D, § 725.152(d) [40 CFR §§ 262.34(a)(4); 40 CFR part 265, Subpart D, § 265.52(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under 35 IAC § 725.152(d) [40 CFR § 265.52(d)]. The contingency plan for the Laboratory Services Building does not list the home addresses of the two Emergency Coordinators, Steven Beaudoin and Rebecca Bratt. The address listed for these two employees is for

the Office of Safety and Environmental Affairs, which is an on-campus address. University of Chicago therefore failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility contingency plan requirement.

5. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must include in its contingency plan a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment] where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list and a brief outline of its capabilities. See, 35 IAC §§ 722.134(a)(4), and 725, Subpart D, § 725.152(e) [40 CFR §§ 262.34(a)(4); 40 CFR part 265, Subpart D, § 265.52(e)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under 35 IAC § 725.152(e) [40 CFR § 265.52(e)]. The contingency plan for the Laboratory Services Building does not include all of the emergency equipment located in the Laboratory Services Building, or the location, physical description, and a brief outline of the capabilities of the non-listed items. Specifically, the items stored in the cabinets near the entrance of the Laboratory Services Building are not listed. These items include neutralizers, adsorbent material, safety goggles, scoops, base control, and numerous other items. University of Chicago therefore failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility contingency plan requirement.
6. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must immediately amend its contingency plan when the list of emergency coordinators changes. See, 35 IAC §§ 722.134(a)(4), and 725, Subpart D, § 725.154(d) [40 CFR §§ 262.34(a)(4); 40 CFR part 265, Subpart D, § 265.54(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under 35 IAC § 725.154(d) [40 CFR § 265.54(d)]. At the time of the inspection, the contingency plan for the Laboratory Services Building still listed the names of two former emergency coordinators, Dr. Sam Wang and Dr. Roy Mackal, in addition to the current emergency coordinators, Steven Beaudoin and Rebecca Bratt. University of Chicago therefore failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility contingency plan requirement.
7. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers must always keep the containers closed except when it is necessary to add or remove waste. See, 35 IAC §§ 722.134(c)(1)(A), 725.273(a) [40 CFR §§ 262.34(c)(1)(i), 265.173(a)]. This is also a requirement of owners and operators of hazardous waste storage facilities that use containers to store hazardous waste, under 35 IAC § 725.273(a) [265.173(a)]. At the time of the inspection, numerous

liter sized bottles used to accumulate waste chemicals under fume hoods, in various laboratories on campus, were open, and waste was not being added to or removed from them. Among these were bottles of xylene waste in Rm. 122 of the Biological Sciences Learning Center, a bottle of ethanol waste in Rm. 462 of the Searle Chemistry Laboratories, and a bottle of acetonitrile waste in Rm. 221 of the Cummings Life Science Center. Xylene is listed as a hazardous waste, with the hazardous waste number F003, in 35 IAC § 721.131 [40 CFR § 261.131]. Ethanol and acetonitrile both have flash points that are less than 140 °F (published literature data) and therefore possess the characteristic of ignitability (D001) as defined by 35 IAC § 721.121 [40 CFR § 261.21]. University of Chicago therefore failed to comply with the above-mentioned condition for a storage license exemption, and violated the storage facility container closure requirement.

8. In order to avoid the need to comply with 35 IAC § 722.134(a) [40 CFR § 262.34(a)], or to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers must always mark its containers with the words, "Hazardous Waste," or other words that identify the contents of the containers. See, 35 IAC § 722.134(c)(1)(B) [40 CFR § 262.34(c)(1)(ii)]. At the time of the inspection, numerous liter sized bottles used to accumulate waste chemicals under fume hoods, in various laboratories on campus, were not labeled with the words, "Hazardous Waste," or other content-identifying words. Among them was a bottle containing ethanol waste. University of Chicago therefore failed to comply with the above-mentioned condition for a storage permit exemption.
9. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must maintain documents and records at the facility that list the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job. See, 35 IAC §§ 722.134(a)(4) and 725.116(d)(1) [40 CFR §§ 262.34(a)(4) and 265.16(d)(1)]. This is also a requirement of owners and operators of hazardous waste storage facilities, under 35 IAC § 725.116(d)(1) [40 CFR § 265.16(d)(1)]. At the time of the inspection, University of Chicago did not have these documents. University of Chicago therefore failed to comply with the above-mentioned condition for a storage permit exemption, and violated the storage facility training documentation requirement.
10. A large quantity generator who accumulates hazardous waste on-site for 90 days or fewer and who does not meet the conditions for a permit exemption of 35 IAC § 722.134(a) and (c) is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC §§ 703.121(a),(b); 703.180(c); 705.121(a). Upon failing to comply with the conditions for a permit exemption specified in Nos. 2-9 above, University of Chicago became an operator of a hazardous waste storage facility, and University of Chicago's failure to apply for and obtain a hazardous

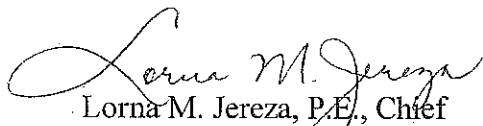
waste storage permit violated the permitting requirements of 35 IAC §§ 703.121(a) and (b); 703.180(c); and 705.121(a).

At this time, U.S. EPA is not requiring University of Chicago to apply for a storage permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

In addition, during the inspection of the Laboratory Services Building, U.S. EPA's inspector observed fluorescent light bulbs on the floor. If these bulbs exhibit one or more of the characteristics identified in 35 IAC Part 721, subpart C (40 CFR Part 261, subpart C), they would be a hazardous waste [e.g. they possess the toxicity characteristic for mercury as defined at 35 IAC § 721.124 (40 CFR § 261.24)]. At a minimum, these bulbs would have to be managed as "Universal Waste" in accordance with the regulations at 40 CFR Part 273 [for example, the bulbs would be required to be stored in a container or package labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)". See, 40 CFR § 273.14(e)]. Please include with your response to this Notice of Violation documentation which demonstrates either that the light bulbs observed during the inspection are not hazardous waste, or that the light bulbs are currently being managed in compliance with 40 CFR Part 273.

You should submit your response to Todd C. Brown, U.S. EPA, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Brown, of my staff, at (312) 886-6091.

Sincerely yours,



Lorna M. Jereza, P.E., Chief
Compliance Section 1

Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosures

cc: Todd Marvel, IEPA

**U.S. E/PA REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH**

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: University of Chicago

FACILITY U.S. EPA ID NO.: ILD 005 421 136

FACILITY TYPE: Large Quantity Generator

FACILITY ADDRESS: Administration Building
5801 South Ellis Avenue
Chicago, IL 60637

Offices of Safety, Environmental Affairs and
Radiation Safety
5555 South Ellis Avenue
Chicago, IL 60637

FACILITY REPRESENTATIVES: Steven Beaudoin
Director
Offices of Safety, Environmental Affairs and
Radiation Safety
(773) 834-1131
(773) 702-6546 Facsimile
sbeaudoi@uchicago.edu

Rebecca Bratt
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Safety and Environmental Affairs
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Ryan M. VanDeWoestyne
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(773) 702-6546 Facsimile
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Carrie Eder
Industrial Hygienist
Safety and Environmental Affairs
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(773) 702-6546
ederc@uchicago.edu

U.S. EPA REPRESENTATIVE:

Todd C. Brown
Environmental Scientist
DE-9J
Compliance Section 1
(312) 886-6091
(312) 353-4342 Facsimile
brown.todd@epa.gov

DATES OF INSPECTION:

August 26-27, 2004

NAIC (SIC) CODE:

62211 - General Medical and Surgical Hospitals
61131 - Colleges, Universities, and Professional
Schools

INSPECTION PRIORITY,

SECTOR, AND/OR PROCESS:

University Initiative/Generator Requirements

PREPARED BY:

Todd C. Brown

I. Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the facility to determine its compliance with the Resource Conservation and Recovery Act (RCRA), with respect to the facility's management of hazardous waste. The purpose of this report is to document the CEI and the facility's compliance status.

II. Facility Description/Back Ground

The University of Chicago (UC) main campus is located in the Hyde Park neighborhood on the south side of Chicago, IL. The approximate boundaries of the campus span north-south from 55th Street to 61st Street, and east-west from Lake Shore Drive to Cottage Grove Avenue (Attachment A; general campus map). UC is an educational institution operating a university including a college, graduate departments, professional schools, primary and secondary schools, libraries, shops, educational research departments, a school of medicine, and hospitals and clinics. The facility is currently a Large Quantity Generator (LQG) of hazardous waste.

UC first notified the United States Environmental Protection Agency (EPA) of its hazardous waste activities in August of 1980. UC filled a Part A permit application in November of 1980 for the on-site container storage of hazardous waste generated at UC, and for the treatment of hazardous waste in tanks and incinerators. However, in a subsequent letter to the EPA dated October 2, 1981, UC stated that they were not treating hazardous waste on-site in incinerators or any other units, and only engaged in the on-site storage of hazardous waste. UC was granted interim status by the EPA on March 10, 1982. UC filed an amended Part A permit application received by EPA on August 1, 1984. The amended Part A did not include incineration and tank treatment of hazardous waste, and added neutralization, hydrolysis, oxidation, precipitation, dissolution, and distillation as hazardous waste treatment methods. UC filed another amended Part A permit application dated December 3, 1990. This application indicated that UC's only hazardous waste operations were the on-site storage of hazardous waste, and treatment of acids and bases using hydrolysis and neutralization. The above mentioned Part A applications indicated that the interim status activities were mainly confined to the George Herbert Jones Laboratory on 57th Street and Ellis Avenue, the Franklin McLean Research Institute Block House on 58th Street and Ellis Avenue, the Laboratory Services Building on 60th Street and Blackstone Avenue, and the Research Institute on the northwest corner of 57th Street and Ellis Avenue.

UC was issued a Part B permit from the Illinois Environmental Protection Agency (IEPA) on July 15, 1991. The Permit was for the storage of hazardous waste in the Laboratory Services Building on 60th Street and Blackstone Avenue. Attachment B shows the layout of the Laboratory Services Building. The building is a concrete block structure that contains four rooms for the segregated storage of hazardous waste; (1) Flammable Room, (2) Toxic Room, (3) Reactive Room, and (4) Corrosive Room. The Part B permit allowed UC to store up to 4,600 gallons of hazardous and nonhazardous waste in the building. This building acts as the central storage facility for all of UC's hazardous waste derived from its laboratories and affiliated hospitals. The hazardous wastes accumulated in this building are stored in containers. The storage permit expired on August 19, 2001, and was not renewed by UC. A memo from Anna Van Orden, an inspector at IEPA, to Rob Watson, Permits, IEPA, dated October 30, 2002, indicates that UC submitted a Closure Plan to IEPA in February of 2002, and that UC had no intention of continuing as a Part B facility (Attachment C). According to a telephone discussion I had with Mr. Watson prior to my inspection of UC, IEPA had not yet been able to process UC's closure. UC currently still uses the Laboratory Services Building as its central accumulation area for hazardous waste.

The hazardous wastes that UC accumulates in the Laboratory Services Building are mainly derived from its teaching and research laboratories. During the opening conference of the inspection, Steven Beaudoin, Director of the Offices of Safety, Environmental Affairs and Radiation Safety, stated that there are approximately 1,200 laboratories that can periodically generate hazardous waste. UC's last Annual Report to the IEPA is given in attachment D. The hazardous wastes generated at UC and applicable hazardous waste codes, as reported on the Annual Report, are listed below in Table 1.

Table 1. Hazardous Wastes Generated by UC in the Year 2003.

Waste Description	EPA Hazardous Waste Codes
Halogenated Solvents	D001, F002, F003, F005, D018
Scintillation Vials with Xylene and Toluene	D001, F003, F005
Lab Packs	LABP
Sodium Hypochlorite	D002
Mercury	D009
Lead Acid Batteries	D002, D008
Fluorescent Light Bulbs	D009
Gas Cylinders - Organic	LABP
Gas Cylinders - Inorganic	LABP
Nickel Cadmium Batteries	D006
P- Listed Lab Packs	LABP
Lead	D008
Lithium Batteries	D003
Mercuric Chloride Solution	D009
Silver Solution	D011
Sulfuric Acid	D002
Sodium Hydroxide Solution	D002
Hydroxyprophonoacetic Acid	D002
Sodium Bisulfate Solution	D002
Hydrochloric Acid	D002

According to Mr. Beaudoin, major generators of hazardous waste at UC are the Cummings Life Science Center (920 E. 58th St.), Searle Chemistry Laboratory (5735 S. Ellis Ave.), and the Biological Sciences Learning Center (924 E. 57th St.). Other generators include the George Herbert Jones Laboratory (5747 S. Ellis Ave.), Henry Hinds Laboratory for the Geophysical Sciences (5734 S. Ellis Ave), the UC hospital, BPSB, UC's paint shop in the ATS building, and

other laboratories. The majority of the hazardous waste consists of unused chemicals or spent chemical wastes. Some solvent wastes are generated from the hospital.

Hazardous wastes at the generation points are stored in liter-sized bottles or 5-gallon buckets. UC employs the services of Wilpen Environmental Services, Inc. (Wilpen), 4750 N. Milwaukee Ave, Chicago IL, for the on-site management of UC's hazardous waste. On Thursdays, WilPen employees come to UC and collect the hazardous wastes from the various generation points that have notified the Office of Safety and Environmental Affairs that a pick up is needed. Wilpen then transports the wastes directly to the Laboratory Services Building. At that point, a determination is made as to whether the material is a waste, a hazardous waste, or a reusable material. The hazardous wastes are then stored in the Laboratory Services Building until they are shipped off-site for further management. According to UC's manifests and annual reports, UC uses Midwest Environmental Transport, Inc., Cincinnati, Ohio, as its hazardous waste transporter, and ships the hazardous waste to Environmental Enterprises, Inc., Cincinnati, Ohio.

III. Opening Conference

I arrived at the Office of Safety and Environmental Affairs located at 5555 S. Ellis Avenue at approximately 9:15 A.M. and met with Steven Beaudoin, Director of the Offices of Safety, Environmental Affairs and Radiation Safety, and held an opening conference. I presented my credentials and explained to Mr. Beaudoin that I was there to perform a hazardous waste inspection. During the opening conference, Mr. Beaudoin explained that all of UC's hazardous waste is accumulated in the Laboratory Services Building, and described the major generation points on campus, as described in the Introduction of this report. Also, as described in the Introduction, Mr. Beaudoin explained that no UC employees handle hazardous waste, and that all of the handling is performed by Wilpen. Mr. Beaudoin confirmed that UC is an LQG, and that UC did not import or export any hazardous waste. I asked if UC handled any mixed wastes (low level radioactive waste mixed with hazardous wastes). Mr. Beaudoin explained that any radioactive materials such as scintillation vials of tritium and ^{14}C , have short half lives, and are allowed to decay before they are managed with hazardous wastes. Mr. Beaudoin also explained that UC has never used incinerators for management of hazardous waste. He also explained that he did not think UC generated any used oil, but could not be sure. Mr. Beaudoin stated that the Safety and Environmental Affairs Office conducted the weekly inspections of the Laboratory Services Building, though all other hazardous waste management was carried out by Wilpen. Mr. Beaudoin explained that all of the safety personnel are Haz Mat Level A certified, and that this training is renewed each year.

I explained that I would like to perform visual inspections of the Laboratory Services Building, the Paint Shop, the Jones Research Facility, the Cummings Life Science Center, the Searle Chemistry Laboratory, and the Biological Sciences Learning Center. I also explained that after the site inspections, I would need to review manifests, waste analysis, annual reports, inspection records, the contingency plan, and training records. Mr. Beaudoin explained that the inspection

records were located in the Laboratory Services Building. After the opening conference, Mr. Beaudoin, Rebecca Bratt (Industrial Hygienist, Safety and Environmental Affairs), Ryan VanDeWoestyne (Safety Officer, Safety and Environmental Affairs), Carrie Eder (Industrial Hygienist, Safety and Environmental Affairs), and I, prepared for the site inspection.

IV. Visual Site Inspection

A. *Laboratory Services Building*

Mr. Beaudoin, Ms. Bratt, Mr. VanDeWoestyne, Ms. Eder, and I all drove to the Laboratory Services Building in a UC vehicle. The building is equipped with an alarm system, and a surveillance camera monitors a locked fence that blocks the driveway to the building. When we arrived at the building, a Wilpen contractor was just leaving. I began my inspection of this building in the area labeled as "Laboratory" in Attachment B. Emergency equipment, safety gear, and spill control equipment are located in this room. A telephone and sinks for running water are also present. I inspected the safety equipment located in cabinets in the Laboratory. Photographs 1-3 (Attachment E) are of some of the safety/spill control equipment. Included in this equipment are neutralizers, adsorbent material, safety goggles, gloves, scoops, base control, and numerous other items. A fire extinguisher is also present in this room.

We then moved to the Flammable Storage Room marked "Flammable Liquids" on Attachment B. Hazardous wastes were being accumulated in 55-gallon containers, 5-gallon buckets, and various small glass bottles that appeared to be the original manufacturer's bottles for the chemicals they contained. Photograph 4 is of a shelf in the flammable storage room that stored six 5-gallon buckets of hazardous waste, and a few small glass bottles of waste chemicals. The 5-gallon buckets were all labeled with the words, "Hazardous Waste," and with accumulation dates. Four of the buckets in photograph #4 were labeled U133 hydrozene anhydrous, P003 acrolein dimer, D001-D002 perchloric acid, and D002-D003-D022 bromine. None of the small bottles in photograph 4 were labeled with the words, "Hazardous Waste," nor were they labeled with accumulation dates. Photograph 5 is a close up of the bottle featured on the top shelf in photograph 4. This bottle had a pinkish colored material coating its exterior. Ms. Bratt believed the bottle contained nitric acid and had been involved in a spill.

Photograph 6 is of another shelving unit holding various waste chemicals in their original containers. None of these chemicals were labeled with the words, "Hazardous Waste," or accumulation dates. Photograph 7 is a close up of some of the chemicals on the bottom shelf and photograph 8 is a close up of some the chemicals on the top shelf. Among the chemicals present on these shelves were bottles labeled allylmagnesium bromide (with the word "Bad" written on it), cuminum, ammonium sulfide, potassium butyl borohydride, triethyl amine DT, 1-isopropyl amines, 4-nitrobenzo alcohol. Mr. Beaudoin was not sure if all of the chemicals in the bottles had been designated as wastes yet. At this point, he said he was going to call their waste contractor, Wilpen, and find out how long the bottles had been there, and what was going to happen with them. Given that this was a Thursday, Wilpen was on campus.

Across from the above-mentioned shelves were two 55-gallon containers of hazardous waste; one labeled as xylene, and the other as xylene and benzene (photograph 9). The containers were closed, in good condition, and were properly labeled and dated. Photograph 10 is of the label on the container of xylene and benzene waste. Also present in the Flammable Storage Room, was one 55-gallon container of lab packed hazardous waste with an unsecured lid (photographs 11 and 12). At this time Mr. Beaudoin secured the lid. I also observed two 55-gallon containers of acetic acid and chloroform hazardous wastes. The containers were closed, labeled, dated, and appeared to be in good condition.

We next moved to the Toxic Storage Room which is a small 4' X 4' room labeled "Toxic Mat'l" on Attachment B. Four 5-gallon buckets of hazardous waste were present in this room. They were labeled with the words, "Hazardous Waste," and had accumulation dates from June and July of 2004. One of the buckets was labeled as containing mercury and acetone, with the waste codes D001, D009, and F003. The other three buckets were labeled as containing mercury, and had the waste code D009. There were also two 4-liter bottles labeled as containing mercury and nitric acid. Another 4-liter bottle was present and labeled as containing mercury in acetone with sulfur. The three 4-liter bottles are featured on the top shelf in photograph 14. Also featured in the photograph, on the same shelf, to the right of the 4-liter bottles, is a smaller, amber colored bottle that had the word "silver" written on it. None of these bottles were labeled with the words, "Hazardous Waste," or with accumulation dates. On the second from the bottom shelf was an assortment of small bottles containing chemical wastes in what appeared to be the original manufacturer's bottle (photograph 13). A close up of these bottles is provided in photograph 14. Among the bottles, were bottles labeled silver nitrate, silver(II)oxide, hydrogen peroxide, strontium nitrate, and sodium meta periodate. None of these bottles were labeled with the words, "Hazardous Waste," or with accumulation dates.

Next I inspected the Reactive Storage Room. This is also 4'X4' room, and is directly adjacent to the Toxic Storage Room. However, the map of the Laboratory Services building in Attachment B labels this room as "Corrosive," and places the "Reactive" storage one over. In this room I observed three buckets of hazardous waste labeled D001-D003 sodium hydrous sulfite, D001-D003 picric acid, and D001-D003 sodium sulfide anhydrous. These buckets were labeled with the words, "Hazardous Waste," and had accumulation dates on them. This room also contained an assortment of waste chemicals in what appeared to be the original manufacturer's bottle, which were not labeled with the words, "Hazardous Waste," or with accumulation dates. Photograph 15 features the assortment of small bottles on a shelf in the Reactive Storage Room. Among them, were bottles labeled waste NaCN, 3M sodium thiosulfate, sodium thiocyanate, and RNA STAT GO. There were also two jars labeled Raney Ni Waste.

I next inspected the Corrosive Storage Room. This is again a small 4'X4' room, and is adjacent to the Reactive Storage Room (however, it is labeled "Reactive" on Attachment B). One 55-gallon container of sodium hydroxide hazardous waste (D002) was present, labeled with the words, "Hazardous Waste," and marked with an accumulation date (photograph 16). I also observed in

this room one bucket and one 4-liter bottle, both labeled as containing sulfuric acid (indicated by H_2SO_4 ; photograph 17). Both the bucket and the bottle were not labeled with the words, "Hazardous Waste," or with accumulation dates.

At this point Mr. Beaudoin had been able to contact Todd Herbig, an employee of Wilpen, to find out why the Laboratory Services Building contained various bottles of waste chemicals that were not labeled and dated. Mr. Beaudoin explained that Mr. Herbig was in the process of lab packing all of these bottles prior to my coming there for an inspection. This was a Thursday, which is the normal day that Wilpen comes to UC to pick up hazardous waste from the generation points, brings the waste to the Laboratory Services Building, and determines how they should be further managed. Mr. Beaudoin explained that the bottles would all be in containers by the end of the day.

We then moved to a drum staging area in the building. This room is labeled as "Storage 55 Gallon Drums" on Attachment B. In this room, I observed containers (55-gallon and less) of hazardous wastes consisting of xylene and benzene, hexane, xylene and toluene, chromic acid, and chloroform. All of the containers holding hazardous waste were properly labeled and appeared to be in good condition. A few of the chloroform containers (brown ones in photograph 18), were stored such that the labels could not be seen without moving them. Mr. Beaudoin, promptly corrected this. Photographs 18 and 19 are of containers of both hazardous and nonhazardous wastes in this room. I also observed a small stack of fluorescent light bulbs on the floor. They were not in a container and they were not labeled as Universal Waste. According to UC, they were going to be recycled.

This concluded my inspection of the Laboratory Services Building. I left there at approximately 10:40 A.M.

B. *Biological Sciences Learning Center*

After I finished with my inspection of the Laboratory Services Building, we went back to the 5555 S. Ellis building to return the UC vehicle. Then Mr. Beaudoin, Ms. Bratt, Ms. Eder, and I went on foot to the Biological Sciences Learning Center. I inspected two laboratories on each of the first and second floors. On the first floor, spill control equipment, an emergency shower, eye wash, and fire extinguishers were located in the hallway. In Rm. 102, I observed one small bottle (liter sized) of chloroform waste (isoamyl chloroform). The bottle was located in a hood, was labeled as isoamyl chloroform, and was closed. I also observed one small bottle of labeled organic waste, also in a hood, and closed. According to a person in the lab, it contained organic solvent waste. In Rm. 122, I observed a 4-liter bottle containing xylene waste in it. It was also located under a hood. The bottle was open.

On the second floor, in Rm. 222, I observed a 1-gallon container of waste marked as DAB waste. In Rm. 222, I observed bottles of xylene waste and chloroform waste under hoods. The bottles

were labeled as to their contents. I also observed a bucket used to accumulate solid waste that comes into contact with chloroform. The bucket was not labeled.

After my inspection of these labs, we all returned to the 5555 South Ellis Building. We then took a break for lunch and agreed to meet back there when we were finished.

C. *Searle Chemistry Laboratories / George Herbert Jones Laboratory*

After my lunch, I began reviewing UC's manifest records while I waited for everyone to arrive. The manifests are stored in a metal cabinet in the Safety and Environmental Affairs Office. See Section V.A. for details on the manifest review.

Mr. Beaudoin, Ms. Bratt, Ms. Eder, and I, then walked to the Searle Chemistry laboratories building located at 5735 S. Ellis. Mr. Beaudoin departed from the group at this point. This building is also attached to the George Herbert Jones Laboratory whose address is 5747 S. Ellis Ave. I began my inspection of laboratories on the fourth floor. Showers, eyewash stations, fire extinguishers, and spill kits were located in the hallways of the building. In Rm. 406, waste chemicals are accumulated in small bottles under fume hoods, and are usually segregated into different bottles as organic, aqueous, and acidic waste. I observed two 4-liter bottles of waste chemicals under a fume hood that were open and not labeled. The person I spoke with at the lab, Ed Stebarg, was not exactly sure what was in them. I also observed five 4-liter bottles of chemical wastes that were again not labeled and open under a fume hood.

In Rm. 414, wastes were being collected under fume hoods in bottles. The types of waste are segregated as organic, acidic aqueous, and aqueous wastes. I observed one 4-liter bottle of chemical waste under a hood unlabeled and open, and four 4-liter bottles of chemical waste under another hood open and unlabeled.

In Rm. 454 I observed one 4-liter bottle of waste chemicals in a hood that was open. I also observed three other waste bottles containing organic waste under a hood. Two of them were open. In room 462 I observed a bottle of ethanol waste not labeled and open, again under a hood.

We then crossed over to the fourth floor of the George Herbert Jones Laboratory. Here I observed organic solvent waste bottles in Rm. 401. We then crossed back over to Searle and went to the third floor. On the third floor I first visited Rm. 362 and did not observe any wastes. I then went to Rm. 354 and observed one bottle of aqueous waste under a fume hood that was open. Also under a fume hood, was a small bottle of organic waste that was not labeled. In Rm. 346, I observed one unlabeled 20 L container of waste chemical. In Rm. 306 I observed one 4-liter bottle of organic solvent waste that was not labeled.

We then went to the second floor. In Rm. 285, I observed one 4-liter bottle under a hood labeled waste that was open and did not have a clear description of its contents. In Rm. 205 I observed three bottles of chemical wastes that were unlabeled and open under a fume hood. According to a researcher in the lab, one bottle was for acidic waste, another for chlorinated solvents, and another for non-chlorinated solvents. The person in the laboratory stated that he could not close the bottle of acidic. He stated the bottle could explode do to a build-up of pressure. Ms. Bratt then explained that some of the labs have a compound in the acidic waste that causes pressure to build up. She stated that a few weeks ago, a bottle had exploded in a cabinet.

D. *Cummings Life Science Center*

After my inspection of the Searle Chemistry Laboratories, we headed on foot to the Cummings Life Science Center. Spill control kits and fire extinguishers were again present in the building. In Rm. 1001 I observed no hazardous waste. In Rm. 515 I only observed biohazard wastes. In Rm. 221 I observed one 4-liter container of acetonitrile waste under a fume hood that was open. Mr. Beaudoin joined us briefly during my inspection of this building.

E. *UC Paint Shop*

After my inspection of the Cummings Life Science Center, Ms. Bratt, Ms. Eder, and I went back to the 5555 South Ellis Building to retrieve the UC vehicle so we could drive to UC's paint shop. The paint shop is located at 5620 South Stoney Island. In the building I observed one 55-gallon container of organic solvent waste. According to an employee in this building, no spill control equipment is available. An eyewash station was present.

V. Record Review

After my inspection of the UC Paint Shop, we all headed back to the 5555 South Ellis building so I could perform the record review portion of the inspection.

A. *Manifest Review*

I began by resuming the manifest review. Manifests were only available on file dating back to August 12, 2002. UC was unable to locate previous manifests. Mr. Beaudoin and Ms. Bratt explained that they had recently moved their office to this building, and that it was possible that the manifests could have been disposed of during the move. Land Disposal Restriction Notification forms accompanied manifests for hazardous waste shipments that I reviewed. All of the manifests listed Environmental Enterprises Inc., as the designated facility, and Environmental Transporters as the transporter. IL manifest number 10130063 signed by the generator on August 12, 2004, and by the transporter on August 17, 2004, only included the generator copy. The manifest included 100 G of diaminobenzidine without a waste code. IL state manifest number 10130064 lists 210 gallons of formaldehyde waste without an EPA waste code. Attached to the manifest were 7 sheets of paper, which appeared to be used for recording pickups of containers, that each listed 30 gallons of formaldehyde derived from the UC hospital. IL manifest number

10161863 also listed 240 gallons of formaldehyde waste without an EPA waste code. This manifest was signed by the generator on July 10, 2003. I asked Ms. Bratt why these formaldehyde shipments did not indicate an EPA waste code, and explained that if the formaldehyde is an unused commercial chemical product, it should carry the waste code U122. Ms. Bratt contacted Wilpen, to inquire about the formaldehyde shipments. After speaking with Wilpen, Ms. Bratt explained that the formaldehyde is used by the hospital to preserve tissue. Once they are done with the tissue, the formaldehyde is drained so the tissues can be disposed of. The formaldehyde ultimately gets incinerated. The manifests for the formaldehyde shipments listed Environmental Enterprises, Inc., as the designated facility.

I left UC around 4:20 P.M. and explained to Ms. Bratt that I would return the next morning, around 8:00 A.M., to finish the record review. I returned to the 5555 S. Ellis building the next morning (August 27, 2004) around 8:00 A.M. and began looking at UC's contingency Plan. The facility has on file a contingency plan for the Laboratory Services building. However, the UC website also has emergency procedure plans and safety information online. This information can be found at <http://chemistry.uchicago.edu/safety.shtml>. Ms. Bratt printed out a copy of Section 3.5 of the Emergency Response Plan for Hazardous Materials. She also made a photo copy of UC's emergency contact list (internal and external) along with a list of emergency spill response items. These lists, and the Emergency Response Plan for Hazardous Materials, and the are kept in binders that are used by the Safety and Environmental Affairs employees when responding to incidents. I chose to take copies of the contingency plan and emergency response plan back to the office for further review. (See Section V.D.)

B. *Financial Assurance Records*

While at UC, I reviewed the facility's financial assurance documents. UC uses a financial test to fulfil the financial assurance requirements for the Laboratory Services Building, whose closure as a Part B permitted facility is not yet approved by IEPA (See Section II). The financial assurance document I reviewed consisted of a letter/work sheet to the IEPA from UC's Chief Financial Officer, Donald J. Reaves. The document appears to indicate that UC has the required financial assurance for closure, post-closure, and annual aggregate liability. The worksheet is accompanied by a letter to IEPA from Mr. Beaudoin indicating that the financial assurance documents were submitted to IEPA along with an independent auditor's report.

C. *Annual Reports*

Annual Reports were on file at UC dating back to the year 2000. The reports all appear to have been submitted by the required dead line. The annual report for the 2004 Reporting Year is given in Attachment D.

D. *Contingency Plan*

UC has on file a contingency plan that is specific to the Laboratory Services Building, where all of UC's hazardous waste is eventually stored. A copy of the plan was obtained during the inspection and reviewed back at my office. The plan was last revised on May 10, 1989, with the exception of the addition of two new emergency coordinators in November of 2002 (Attachment F). The deficiencies in the plan are as follows.

- The contingency plan does not include the home addresses of the two current emergency coordinators; Steven Beaudoin and Rebecca Bratt. The address listed for both of them is for the Safety and Environmental Affairs Office at 5555 South Ellis Avenue.
- The contingency plan still lists the names of two former emergency coordinators, Dr. Sam Wang and Dr. Roy Mackal.
- The list of emergency equipment is not up to date. I observed emergency equipment while inspecting the Laboratory Services Building that is not described in the plan (Section IV.A.).

The UC website also has emergency procedure plans and safety information online. This information can be found at <http://chemistry.uchicago.edu/safety.shtml>. One of the documents available on this website is entitled "Safety Manual" and is located under "Chemical Spill Response." Section 3.5 of this manual, Emergency Response Plan for Hazardous Materials, is used by the Office of Safety and Environmental Affairs and kept in a binder along with an emergency contact list (internal and external) and a list of emergency response items. I obtained a copy of these documents during the inspection and reviewed them back at my office (Attachment G). The plan states that it pertains to any hazardous chemical release, select agent release, confirmed fire, serious injury or death resulting from the release of a hazardous chemical or select agent, and is developed to minimize the severity of damage to human health and the environment in the event of an unexpected hazardous materials release.

E. *Training Records*

UC's training records consisted of certificates for various employees at UC as well as for employees of Wilpen who regularly work with UC. These certificates are maintained onsite in a folder. Table 2 lists some of the certificates I reviewed, including the name of the person who received the certificate, the type of training indicated on the certificate, and the year the certificate was awarded.

Table 2. Training Records Review

Person Trained	Type of Training	Date of Certificate
Carrie Eder	Hazardous Materials Training	7/14/2004
Debra Robinson	Hazardous Waste Operations	7/10/2002
Debra Robinson	24-hr Hazardous Waste and Emergency Response Training	1/10/2001
Donald Samaan	8-hr Hazardous Materials Technician Training	5/7/2003
Donald Samaan	24-hr Hazardous Waste and Emergency Response Training	1/10/2001
Donald Samaan	24-hr Hazardous Materials Basic Technician Training	6/16/1999
James Marsicek	8-hr Hazardous Materials Refresher Training	9/29/2003
Michael Wilk	8-hr OSHA Hazardous Communications	2/8/2004
Michael Wilk	8-hr Refresher Training for Hazardous Waste Sites	2/7/2004
Michael Wilk	8-hr Hazardous Waste Site Refresher Training OSHA 1910.120	2/27/2002
Michael Wilk	8-hr RCRA Training by Willpen	2/16/2002
Michael Wilk	8-hr Hazardous Waste Site Refresher Training OSHA 1910.120	2/19/2000
Michael Wilk	8-hr Hazardous Waste Site Training	2/22/1998
Michael Wilk	8-hr RCRA Training at Wilpen	2/21/1998

Table 2. Training Records Review (continued)

Person Trained	Type of Training	Date of Certificate
Michael Wilk	DOT HM-181 Hazardous Materials Training	2/15/1998
Michael Wilk	Hazardous Communication Training (OSHA)	2/14/1998
Pat McNeil	4-hr-HM-126F DOT Training	5/8/1998
Rebecca Bratt	8-hr Hazardous Materials Refresher Training	5/6/2003
Rebecca Bratt	8-hr Hazardous Materials Refresher	5/29/2002
Rebecca Bratt	8-hr HAZWOPER Refresher Training	5/31/2001
Rebecca Bratt	8-hr HAZWOPER	3/27/2000
Ryan M. VanDeWoestyne	Hazardous Materials Training	7/14/2004
Steven Beaudoin	Emergency Coordinator and Hazardous Waste Management Compliance Seminar	8/7/2003
Steven Beaudoin	Hazardous Materials Refresher	6/13/2003
Steven Beaudoin	RCRA Training Seminar	8/15/2002
Steven Beaudoin	Emergency Coordinator and Hazardous Waste Management Compliance Seminar	8/8/2002
Steven Beaudoin	8-hr Hazardous Materials Refresher Training	5/29/2002
Steven Beaudoin	8-hr HAZWOPER Training	5/31/2001
Steven Beaudoin	8-hr HAZWOPER Training	5/3/2000
Steven Beaudoin	4-hr-HM126F DOT Training	5/8/1998

Table 2. Training Records Review (continued)

Person Trained	Type of Training	Date of Certificate
Steven Beaudoin	Hazardous Waste and Emergency Response Training	3/13/1998
Steven Beaudoin	8-hr Hazardous Waste Site Operations Personnel Training	11/25/1996
Todd Herbig	8-hr OSHA Hazardous Communications	2/8/2004
Todd Herbig	8-hr Refresher Training for Hazardous Waste Sites	2/7/2004
Todd Herbig	8-hr RCRA Training by Willpen	2/16/2002
Todd Herbig	Hazardous Waste Site Training	2/19/2000
Todd Herbig	Hazardous Waste Site Training Refresher	2/22/1998
Todd Herbig	8-hr RCRA Training by Wilpen	2/21/1998
Todd Herbig	8-hr DOT HM-181 Hazardous Materials Training	2/15/1998
Todd Herbig	Hazardous Communication Training	2/14/1998
Todd Herbig	8-hr Hazardous Waste Site Refresher Training OSHA 1910.120	2/27/2002
Todd Roeder	Hazardous Materials Refresher	8/15/2002
Walter P. McNeil	40-hr Hazardous Waste Site Operations Training Course	3/10/1995

As noted in Table 2, Mr. Beaudoin and Ms. Bratt have certificates indicating they have received various training related to hazardous waste management and emergency response, including HAZWOPER (Hazardous Waste Operations and Emergency Response). Mr. Beaudoin also appears to have received various RCRA specific training. Ms. Eder and Mr. VanDeWoestyne have received Hazardous Materials training in 2004. Information on emergency personnel positions, duties, and required training is included in the Emergency Response Plan for Hazardous Materials (Attachment G). Page 4 of the plan lists the following Emergency Response Team positions along with a description of their duties; On-Scene Incident Commander, Hazardous Materials Technician, Emergency Medical Team, and Site Safety Officer. In addition, the plan describes that one Hazardous Materials Technician will be chosen to serve as an Entry Team Leader during an emergency response. Page 6 of the plan lists the training requirements (initial and annual) for the following positions; First Responder Awareness Level, On-Scene Incident Commander, and Hazardous Materials Technician. Attached to the beginning of the plan is a list of people who serve on the Hazardous Materials Response Team that includes office, pager, cell, and home phone numbers. Steven Beaudoin, Rebecca Bratt, Ryan VanDeWoestyne, and Carrie Eder are all listed as members on the team (page 2).

E. *Waste Analysis*

At the inspection I asked to see any waste analyses that UC had on file. Mr. Beaudoin had Wilpen Environmental Services fax me a copy of a waste analysis. The fax is included in Attachment H. It contains a Waste Receipt Worksheet, from Environmental Enterprises Inc., for a shipment of 280 gallons of solvent with the waste codes D001, D018, D022, D038, F002, F003, F005, and D036. It also includes an analytical report for a PCB test on oil.

VI. Closing Conference

At the conclusion of the inspection, I held a closing conference with Ms. Bratt. During the conference, I explained that I would need to review the information I collected during the inspection in conjunction with the state regulations to make a final determination of UC's compliance status. However, I did communicate certain discoveries that I did feel were of concern.

Specifically, I stated my concern over the fact that UC's contingency plan still contained the names of the old emergency coordinators. With respect to UC's contingency plan, I also explained that I would need to compare both plans (Attachments F and G) to determine UC's overall compliance with the contingency plan requirements. I also stated I was concerned with all of the undated and unlabeled bottles in the Laboratory Service Building. I explained that I was concerned about all of the unlabeled and open containers of waste chemicals in the various laboratories I inspected. On this point, I explained that though I cannot be sure that every one of those bottles contained a RCRA hazardous waste, many of them likely did, especially organic solvents which probably have low flash points, acidic waste which may be corrosive, and certain specific waste like xylene, which is a listed hazardous waste. I explained that UC needs to

determine what satellite areas contain hazardous waste and appropriately label and close them. We discussed that to be on the safe side, UC might want to treat all of these accumulation areas as hazardous waste satellite accumulation areas, until they determine otherwise. I also explained my concern over UC not having manifests on file for the year 2001. We discussed that they could probably get copies of these from their waste treatment facility. I also explained my concern over there not being a document that describes the hazardous waste training that is given to employees including the name and title of each person with hazardous waste duties.

I asked Ms. Bratt if arrangements had been made with local authorities to familiarize them with the layout of the facility. Ms. Bratt explained that the Fire Department, Police, and Chicago's 511-Haz Mat Squad have visited UC. I asked Ms. Bratt if the Emergency Response Plan for Hazardous Materials had been submitted to emergency responders like the police, fire department, and hospital. Ms. Bratt replied that she was not sure. I enquired about the timing of training for new employees to the Office of Safety and Environmental Affairs. Ms. Bratt explained that training is received in at least 6 months, and further explained that Ms. Eder, a new employee this year, received her training in one month (see table 2 for certification).

During the closing conference, Ms. Bratt asked if she could have a copy of the check list I was using. I explained that I would inquire about this back at the office. Finally, I asked Ms. Bratt if we could go back to the Laboratory Services Building, so I could confirm that all of the unlabeled waste bottles observed yesterday, had indeed been lab packed. Ms. Bratt agreed to take me there.

VII. Reinspection of the Laboratory Services Building

Ms. Bratt, Ms. Eder, and I returned to the Laboratory Services Building at approximately 11:00 A.M. All of the unlabeled and undated bottles observed on the previous day, were either gone, or had been lab packed. Photographs 21 - 24 are of the flammable, toxic, reactive, and corrosive storage rooms, and show that the unlabeled and undated bottles and containers featured in photographs 6-8 and 13-17, were either no longer present, or had been lab packed into labeled containers.

Attachments:

Attachment A:	UC Campus Map
Attachment B:	Laboratory Services Building Layout
Attachment C:	IEPA Memo
Attachment D:	UC Annual Report
Attachment E:	Photographs Taken During CEI
Attachment F:	Laboratory Service Building Contingency Plan

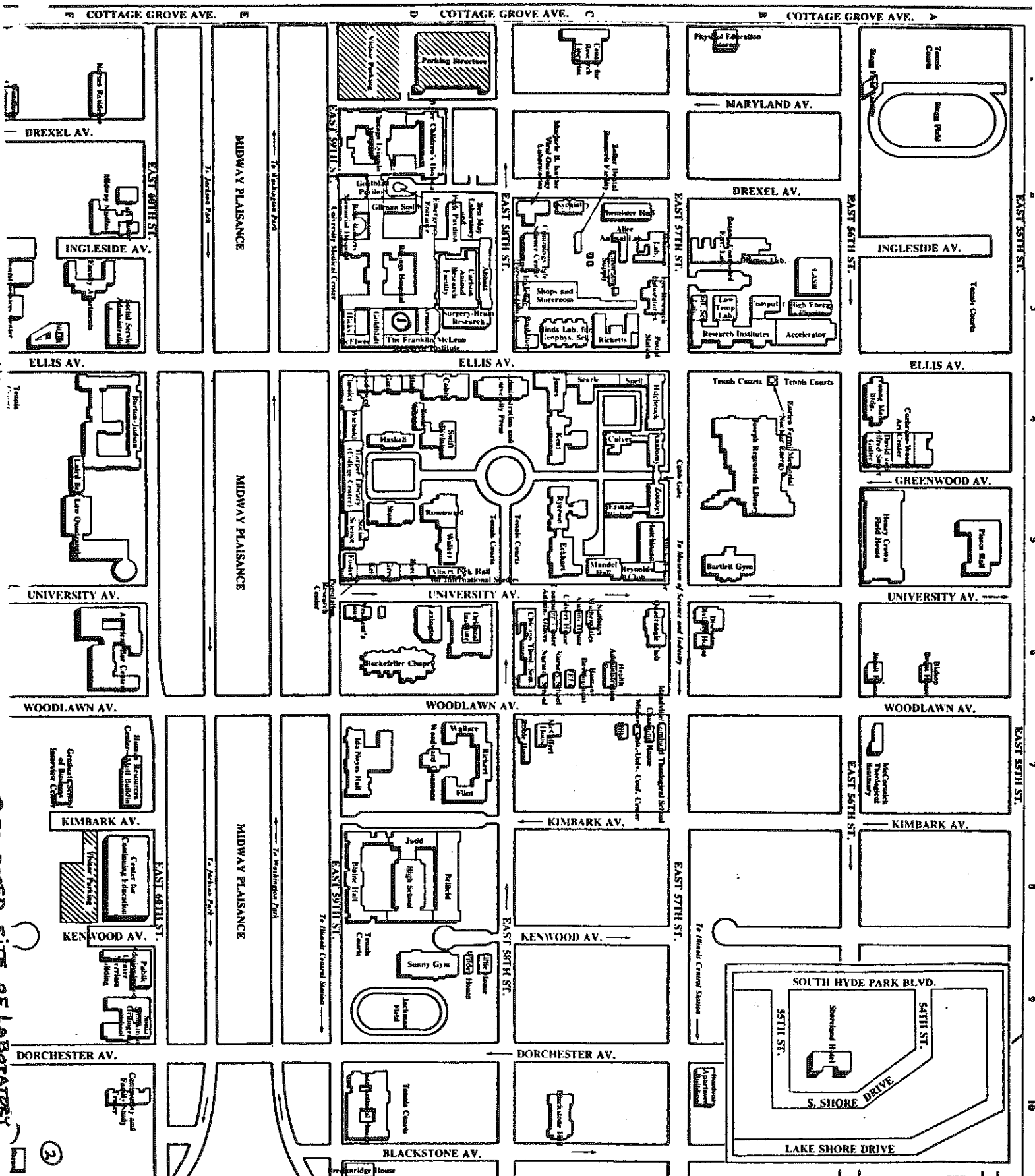
Attachment A

UC Campus Map

THE UNIVERSITY OF CHICAGO

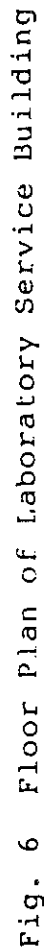
① EXISTING CHEMICAL WASTE

② PROPOSED SITE OF LABORATORY



Attachment B

Laboratory Services Building Layout



Attachment C

IEPA Memo

MEMO

DATE: October 30, 2002
TO: Rob Watson, Permits
FROM: Anna Van Orden, BOL/FOS/Des Plaines
RE: 0316410001 – Cook County
Chicago/University of Chicago
Closure File

On October 29, 2002, A RCRA/Part B compliance inspection was conducted at University of Chicago Hospital located at 5555 South Ellis Avenue in Chicago.

The facility's Part B Permit expired on August 19, 2001, and a revised Closure Plan dated February 28, 2002 was submitted to the Agency. The facility has no plan for continuing as a Part B facility. They have never accumulated waste on site for over 90 days.

FOS recommends, Permits expedite the revised Closure Plan for Laboratory Service Building used for accumulating hazardous waste. The floor of the building is concrete and coated. No cracks were observed. Areas of storage were diked to contain any leaks or spills. At the time of the inspection no waste was on-site.

Attached are photos of storage and staging areas in the building. If you have any questions please contact me at 847/294-4068.

bcc: Division File
Des Plaines Region

Attachment D

UC Annual Report

Lorna Jereza/R5/USEPA/US

10/22/2004 10:42 AM

To Illinois EPA

cc Todd Brown/R5/USEPA/US, Harriet Croke/R5/USEPA/US,

bcc

Subject E enforcement Action Communication- (University of
Chicago-NOV)


This is to inform you that on October 26, 2004, U.S. EPA will send by certified mail, the attached notice of violation (NOV) to the University of Chicago facility (the facility) The alledged violations were found during U.S. EPA's August 26-27, 2004, compliance evaluation inspection of the facility.

Contact: Todd Brown, (312) 886-6091.



UC.NOV.wpd

James Cha/R5/USEPA/US
10/21/2004 01:28 PM


To Todd Brown/R5/USEPA/US@EPA
cc
bcc
Subject Re: UC NOV concurrence 

Hi, Todd. I concur. Go ahead and issue the NOV. Thanks.

Todd Brown/R5/USEPA/US



Todd Brown/R5/USEPA/US
10/21/2004 12:53 PM

To James Cha/R5/USEPA/US@EPA
cc
Subject Re: UC NOV concurrence 

James,

Thanks for looking at the NOV for me. I have made two changes.

1) Though I agree with you about the spacing in the individual paragraphs, I had to change it back. This is because our current Acting Branch Chief does not like to see regulatory citations separated across two lines. i.e. she prefers:

35 IAC 722.134(a)(1)(A) [40 CFR 262.34(a)(1)(i)]

over,

35 IAC 722.134(a)(1)(A) [40 CFR
262.34(a)(1)(i)].

Therefore, I just do it that way, regardless of how it makes the paragraph look. This is a convention that is used by the permitting section, where Harriet previously worked.

2) I revised the last paragraph about the Universal Waste to be more specific and accurate, and to refer the University to the exact regulatory citations. Thanks allot for getting that started though.

Let me know if you concur with the revision so I can send it out. My revisions to the Universal Waste part are in red.

Thanks again,

Todd



UC.NOV.wpd



Waste, Pesticides and Toxics Division

Type of Document: ☒ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing and Opportunity to Confer
☐ State Notification of Enforcement Action

Facility Name : University of Chicago

Facility Location: 5801 S. Ellis Avenue

City: Chicago State: Illinois

U.S. EPA ID# ILD 005 421 136

Assigned Staff Todd Brown Phone: (312)886-6091

Name	Signature	Date
Author	<i>Todd Brown</i>	10/22/04
Regional Counsel	<i>e-concurrence (James Cha, ORC)</i>	10/21/04
Section Chief	<i>Laura M. Jung</i>	10/22/04
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.



The University Of Chicago
.Risk Management, Audit and Safety.
Safety and Environmental Affairs
5555 South Ellis Avenue, Chicago, Illinois
60637

Steven Beaudoin
Director Safety and Environmental Affairs

Phone: (773) 834-1131
Fax: (773) 702-6546
email: sbeaudoi@uchicago.edu

November 18, 2004

Mr. Todd Brown
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Notice of Violation – EPA Id No.: ILD 005 421 136

Dear Mr. Brown:

Pursuant to the certified letter received October 26, 2004, regarding Violation Notice EPA Id No.: ILD 005 421 136, the University of Chicago has the following response.

1. **Violation:** 35 IAC 722.123(a) [40 CFR 262.23(a)], a generator must keep a copy of each signed manifest for three years from the date the waste was accepted by the initial transporter. At the time of the inspection, University of Chicago only had manifests for on file that dated back to August 12, 2002.

Response

The University of Chicago acknowledges that at the time of the inspection there were only manifests on file that dated back to August 12, 2002. Safety and Environmental Affairs had recently renovated and moved offices and it is believed that during that move those manifests were accidentally thrown away. Safety and Environmental Affairs contacted Environmental Enterprises Incorporated to obtain copies of the missing documents. Copies of manifests were received and put on file on August 30, 2004.

2. **Violation:** 35 IAC 722.134(a)(1)(A), and 725, Subpart I, 725.273(a) [40 CFR 262.34(a)(1)(i); 40 CFR part 265, Subpart I, 265.173(a)], to avoid the need for a hazardous waste storage permit, large quantity generator using containers to store hazardous waste must always keep those containers closed during storage, except when it is necessary to add or remove waste. At the time of inspection, one 55-gallon container of lab-packed hazardous waste stored in the Flammable Storage Room at the Lab Services Building was not completely closed.

Response

Safety and Environmental Affairs corrected this at the time of the inspection and the contractor servicing the University of Chicago has been reminded of their responsibility.

3. **Violation:** 35 IAC 722.134(a)(2) [40 CFR 262.34(a)(2)], to avoid the need for a hazardous waste storage permit, large quantity generator using containers to store hazardous waste must ensure that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. At the time of inspection several containers of chloroform hazardous waste (D002) were stored in the "staging area" at the Laboratory Services Building. The containers were stored on top of other 55-gallon containers of waste, against a wall, with their labels facing the wall. Therefore, their accumulation dates were not visible for inspection.

Response

Safety and Environmental Affairs corrected this at the time of the inspection and the contractor servicing the University of Chicago has been reminded of their responsibility.

4. **Violation:** 35 IAC 722.134(a), and 725, Subpart D, 725.152(d) [40 CFR 262.34(a)(4); 40 CFR part 265, Subpart D, 265.52(d)], to avoid the need for a hazardous waste storage permit, large quantity generator must list the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator in the facility's contingency plan, and this list must be kept up to date. The contingency plan for the Laboratory Services Building does not list the home addresses of the two Emergency Coordinators. The address listed for these two employees is the Office of Safety and Environmental Affairs.

Response

The University of Chicago has made the corrections to the contingency plan. See appendix A.

5. **Violation:** 35 IAC 722.134(a), and 725, Subpart D, 725.152(e) [40 CFR 262.34(a)(4); 40 CFR part 265, Subpart D, 265.52(e)]. To avoid the need for a hazardous waste storage permit, large quantity generator must include in its contingency plan a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment] where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and physical description of each item on the list and a brief outline of its capabilities. The contingency plan for the Laboratory Services Building does not include all of the emergency equipment located in the Laboratory Services Building, or the location, physical description, and a brief outline of the capabilities of the non-listed items. Specifically, the items stored in the cabinets near the entrance of the Laboratory Services Building are not listed. These items include neutralizers, absorbent material, safety goggles, scoops, base control, and numerous other items.

Response

The University of Chicago has made the corrections to the contingency plan. See appendix A.

6. **Violation:** 35 IAC 722.134(a)(4), and 725, Subpart D, 725.154(d) [40 CFR 262.34(a)(4); 40 CFR part 265, Subpart D, 265.54(d)], to avoid the need for a hazardous waste storage permit, large quantity generator must immediately amend its contingency plan when the list of emergency coordinators changes. At the time of the inspection, the contingency plan for the Laboratory Services Building still listed the names of two former emergency coordinators.

Response

The University of Chicago has made the corrections to the contingency plan. See appendix A.

7. **Violation:** 35 IAC 722.134(c)(1)(A), 725.273(a) [40 CFR 262.34(c)(1)(i), 265.173(a)], to avoid the need for a hazardous waste storage permit, large quantity generator must always keep the containers closed except when it is necessary to add or remove waste. At the time of the inspection, numerous liter sized bottles used to accumulate waste chemicals under fume hoods, in various laboratories on campus, were open, and waste was not being added to or removed from them. Among these were bottles of xylene waste in room 122 of the Biological Sciences Learning Center, a bottle of ethanol waste in room 462 of the Searle Chemistry Laboratories, and a bottle of acetonitrile waste in room 221 of the Cummings Life Sciences Center. Xylene is listed as a hazardous waste, with the hazardous waste number F003, in 35 IAC 721.131 [40 CFR 261.131]. Ethanol and acetonitrile both have flash points that are less than 140 °F and therefore possess the characteristic of ignitability (D001) as defined by 35 IAC 721.121 [40 CFR 261.21].

Response

The University of Chicago has sent a letter to each researcher and department notifying each of the requirements. See Appendix B.

8. **Violation:** 35 IAC 722.134(c)(1)(B) [40 CFR 262.34(c)(1)(ii)], to avoid the need for a hazardous waste storage permit, large quantity generator using satellite accumulation containers must always mark its containers with the words, "Hazardous Waste," or other words that identify the contents of the containers. At the time of the inspection, numerous liter sized bottles used to accumulate waste chemicals under fume hoods, in various laboratories on campus, were not labeled with the words, "Hazardous Waste," or other content-identifying words. Among them was a bottle containing ethanol waste.

Response

The University of Chicago has sent a letter to each researcher and department notifying each of the requirements. Safety and Environmental Affairs will be providing labels for the researchers to use to ensure compliance. This will also be incorporated as inspection criteria during periodic lab inspections. See Appendix B.

In addition, the small stack of fluorescent light bulbs that was in the Laboratory Services Building on the floor where from the replacement of bulbs in the building. The bulbs were collected by the recycling group for recycling.

9. **Violation:** 35 IAC 722.134(a)(4) and 725.116(d)(1) [40 CFR 262.34(a)(4) and 265.16(d)(1)], to avoid the need for a hazardous waste storage permit, large quantity generator must maintain documents and records at the facility that list the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job. At the time of the inspection, University of Chicago did not have these documents.

Response

The University of Chicago has made the corrections. See Appendix C.

10. **Violation:** 35 IAC 703.121(a), (b); 703.180(c); 705121(a), a large quantity generator who accumulates hazardous waste on-site for 90 days or fewer and who does not meet the conditions for a permit exemption of 35 IAC 722.134(a) and (c) is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous storage permit. Upon failing to comply with the conditions for a permit exemption specified in Nos. 2-9 above, the University of Chicago became an operator of a hazardous waste storage facility, and the University of Chicago's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements.

Response

The University of Chicago is currently in the process of closing the Part B Permit with the IEPA. University of Chicago has corrected the permit exemption violations specified in Nos. 2-9 of this document and does not intend to be a permitted facility.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Beaudoin", written over a horizontal line.

Steven Beaudoin

Director Safety and Environmental Affairs

Appendix A



The University Of Chicago
Risk Management, Audit and Safety.
Safety and Environmental Affairs
5555 South Ellis Avenue, Chicago, Illinois 60637

Laboratory Service Building
Contingency Plan

Facility Name - Laboratory Service Building
Location - 6041 South Blackstone Avenue, Chicago, Illinois
Operator - The University of Chicago

1. General information

Laboratory Service Building is a receiving point for waste chemicals from research and teaching laboratories of the University of Chicago. Chemicals are received at the facility, sorted and segregated, and stored until a disposal contractor comes on-site to lab pack them. Chemicals are normally received in original containers; usually glass or plastic bottles ranging in size from a few ounces to approximately one gallon. Flammable chemicals may be consolidated into 55-gallon drums for ease of storage and disposal.

The building is a one-story masonry structure without attachment to any other buildings. It is remotely located on the far southeast side of the university campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue (See Figure 1 and Figure 2).

The building occupies an area of 31 feet by 38 feet with finished concrete floor. To the east side of the building there is a fenced yard with a concrete patio. Inside the building it is subdivided into several areas (rooms), including a laboratory, to store chemicals of the same compatibility (flammable, reactive, toxic, and corrosive) and each room is labeled as such. The floor plan and designation of each area is shown in Figure 3.

2. Emergency Coordinators

Primary Coordinator: Steven Beaudoin
Director Safety and Environmental Affairs
115 Denell Drive
Crest, Illinois 60417
Office Phone: 773-702-9999
Home Phone: 708-672-6975

Alternate Coordinator: Krista Cooley
Associate Director Safety and Environmental Affairs
79 Oak Street
Valparaiso, Indiana 46383
Office Phone: 773-702-9999
Home Phone: 219-462-8592

Duties of Emergency Coordinators:

- Providing a "On-Call" Safety Officer twenty-four hours a day, seven days a week;
- Responding with appropriate action to control and remedy the incident;
- Responding to a reported incident in a timely manner;
- Maintaining liaison with the local Police and Fire Departments;
- Notifying Administration of an incident and providing periodic status reports;
- Reviewing and amending the Emergency Response Plan for Hazardous Materials; and
- Taking post-emergency measures to prevent reoccurrences of the incident.

3. Notification

When fire, explosion, or any unexpected release occurs, the facility operator or personnel should immediately:

- Notify other personnel in the building by voice. The facility is small enough that a voice amplification system is not required;
- Notify University Police by dialing 123 from a campus phone or 702-8181 from a non-campus phone;
- Notify emergency coordinator(s) listed on page 1.

4. Control Procedures

1. City Fire Department will respond immediately to any fire, explosion or release of hazardous materials. The Fire Department will contain and control any fire involved at the facility with the assistance of the emergency coordinator. Spill releases will be controlled through use of absorbent material such as vermiculite and spill control pillows.
2. Spill material with the absorbent will be picked up and placed in appropriate storage containers for disposal through the University of Chicago's waste disposal contractor. The facility operator will remove all waste from the spill area for ease of clean-up. The facility will not accept new waste until the spill or leak has been cleaned up and controlled.
3. All equipment and containers will be decontamination or replaced prior to resuming normal operation in the Laboratory Service Building following conclusion of emergency response and clean-up procedures.

5. Emergency Equipment

An emergency shower and eyewash are located by the doorway leading from the office/chemical sorting area, room 108, to the storage rooms. The emergency shower is to be used to flush chemicals from a person whose clothing and/or skin has been contaminated. The eyewash station is to flush a person's eyes that has had chemical splashed into their eyes. (See Figure 3 attached)

Two Class ABC fire extinguishers are located in the office/chemical sorting room and one Class D fire extinguisher is located in the hallway between the storage rooms. The fire extinguishers are to be used to extinguish fires. Extinguishers are intended for use by staff to extinguish fires during fire emergencies. The facility is equipped with a smoke detector system that alarms directly at the Campus Police Department. These devices are needed to warn occupants of a fire and to summon the fire department.

Appendix A

Laboratory coats, face shields, and rubber gloves are located in the chemical sorting area. Laboratory coats, face shields and rubbers gloves are to be worn while handling chemicals in the building. Neutralizers, absorbent material, safety goggles, scoops, base control, are located in the storage cabinets located adjacent to, across from and under the fume hood. The neutralizers and absorbent materials are to be used to clean-up chemical spills as they occur in the building. Safety goggles may also be worn while working with chemicals to protect the eyes from chemical splash. The scoops are to be used to add neutralizer to a chemical spill. These materials are necessary to ensure the safety of staff working in the facility during normal or emergency situations.

6. Evacuation Plan

Evacuation of the facility will be initiated by voice signal to personnel inside. Evacuation from the area will be made by Dorchester Avenue north to Midway Plaisance. Alternate evacuation route would be to go south on Dorchester Avenue.

7. Coordination Agreement Arrangements

The University of Chicago maintains its Police Department and medical facility (The University of Chicago Medical Center). Arrangements have been made with the following response teams in case of an emergency. Copies of this Contingency Plan were sent to each agency.

- University of Chicago Police Department
5555 South Ellis Avenue
Phone: 702-8181
- The University of Chicago Medical Center
Emergency Care
Bernard Mitchell Hospital, 901 East 58th Street
Phone: 702-6250
- City of Chicago Police Department
District Commander
1121 South State Street
Chicago, Illinois
Phone: 744-4000
- City of Chicago Fire Department
District Chief
5955 South Ashland Avenue
Chicago, Illinois 60636
Phone: 747-5017
- City of Chicago Fire Department
Hazardous Materials Chief
558 West DeKoven Street
Chicago, Illinois 60607
Phone: 747-6582

8. Required Reports

A follow-up report detailing the incident, emergency response, clean-up, and actions taken to prevent reoccurrence will be prepared and submitted to the Illinois Environmental Protection Agency within 15 days of occurrence. All records concerning the incident and report will be maintained by the facility operator until three years after final closure of the Laboratory Service Building.

Revised: November 3, 2004



UNIVERSITY OF CHICAGO
SAFETY AND ENVIRONMENTAL AFFAIRS

FACSIMILE TRANSMITTAL SHEET

TO: *Todd Brown*

FROM: *Steven Beaudoin*

COMPANY: *EPA*

DATE: *11/18/04*

FAX NUMBER: *312-353-4342*

NUMBER OF PAGES TO FOLLOW: *8*

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Todd,

I hope you will find the changes you requested to your satisfaction. If anything needs to be corrected let me know.

Steve Beaudoin

5555 SOUTH ELLIS AVENUE

CHICAGO, ILLINOIS 60637

PHONE (773) 702-9999 FAX (773) 702-8548



The University Of Chicago
.Risk Management, Audit and Safety.
Safety and Environmental Affairs
5555 South Ellis Avenue, Chicago, Illinois
60637

Steven Beaudoin
Director Safety and Environmental Affairs

Phone: (773) 834-1131
Fax: (773) 702-6546
email: sbeaudoi@uchicago.edu

November 5, 2004

Mr. Todd Brown
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: **Notice of Violation – EPA Id No.: ILD 005 421 136**

Dear Mr. Brown:

Pursuant to the certified letter received October 26, 2004, regarding Violation Notice EPA Id No.: ILD 005 421 136, the University of Chicago has the following response.

1. **Violation:** 35 IAC 722.123(a) [40 CFR 262.23(a)], a generator must keep a copy of each signed manifest for three years from the date the waste was accepted by the initial transporter. At the time of the inspection, University of Chicago only had manifests for on file that dated back to August 12, 2002.

Response

The University of Chicago acknowledges that at the time of the inspection there were only manifests on file that dated back to August 12, 2002. Safety and Environmental Affairs had recently renovated and moved offices and it is believed that during that move those manifests were accidentally thrown away. Safety and Environmental Affairs contacted Environmental Enterprises Incorporated to obtain copies of the missing documents. Copies of manifests were received and put on file on August 30, 2004.

2. **Violation:** 35 IAC 722.134(a)(1)(A), and 725, Subpart I, 725.273(a) [40 CFR 262.34(a)(1)(i); 40 CFR part 265, Subpart I, 265.173(a)], to avoid the need for a hazardous waste storage permit, large quantity generator using containers to store hazardous waste must always keep those containers closed during storage, except when it is necessary to add or remove waste. At the time of inspection, one 55-gallon container of lab-packed hazardous waste stored in the Flammable Storage Room at the Lab Services Building was not completely closed.

Response

Safety and Environmental Affairs corrected this at the time of the inspection and the contractor servicing the University of Chicago has been reminded of their responsibility.

3. **Violation:** 35 IAC 722.134(a)(2) [40 CFR 262.34(a)(2)], to avoid the need for a hazardous waste storage permit, large quantity generator using containers to store hazardous waste must ensure that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. At the time of inspection several containers of chloroform hazardous waste (D002) were stored in the "staging area" at the Laboratory Services Building. The containers were stored on top of other 55-gallon containers of waste, against a wall, with their labels facing the wall. Therefore, their accumulation dates were not visible for inspection.

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Response

The University of Chicago has made the corrections to the contingency plan. See appendix A.

5. **Violation:** 35 IAC 722.134(a), and 725, Subpart D, 725.152(e) [40 CFR 262.34(a)(4); 40 CFR part 265, Subpart D, 265.52(e)]. To avoid the need for a hazardous waste storage permit, large quantity generator must include in its contingency plan a list of all emergency equipment at the facility [such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment] where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and physical description of each item on the list and a brief outline of its capabilities. The contingency plan for the Laboratory Services Building does not include all of the emergency equipment located in the Laboratory Services Building, or the location, physical description, and a brief outline of the capabilities of the non-listed items. Specifically, the items stored in the cabinets near the entrance of the Laboratory Services Building are not listed. These items include neutralizers, absorbent material, safety goggles, scoops, base control, and numerous other items.

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Response

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Response

The University of Chicago has sent a letter to each researcher and department notifying each of the requirements. See Appendix B.

8. **Violation:** 35 IAC 722.134(c)(1)(B) [40 CFR 262.34(c)(1)(ii)], to avoid the need for a hazardous waste storage permit, large quantity generator using satellite accumulation containers must always mark its containers with the words, "Hazardous Waste," or other words that identify the contents of the containers. At the time of the inspection, numerous liter sized bottles used to accumulate waste chemicals under fume hoods, in various laboratories on campus, were not labeled with the words, "Hazardous Waste," or other content-identifying words. Among them was a bottle containing ethanol waste.

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Response

The University of Chicago has made the corrections. See Appendix C.

10. **Violation:** 35 IAC 703.121(a), (b); 703.180(c); 705121(a), a large quantity generator who accumulates hazardous waste on-site for 90 days or fewer and who does not meet the conditions for a permit exemption of 35 IAC 722.134(a) and (c) is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous storage permit. Upon failing to comply with the conditions for a permit exemption specified in Nos. 2-9 above, the University of Chicago became an operator of a hazardous waste storage facility, and the University of Chicago's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements.

Response

The University of Chicago is currently in the process of closing the Part B Permit with the IEPA. University of Chicago has corrected the permit exemption violations specified in Nos. 2-9 of this document and does not intend to be a permitted facility.

Sincerely,



Steven Beaudoin
Director Safety and Environmental Affairs

Appendix A



The University Of Chicago
.Risk Management, Audit and Safety.
Safety and Environmental Affairs
5555 South Ellis Avenue, Chicago, Illinois 60637

Laboratory Service Building Contingency Plan

Facility Name - Laboratory Service Building
Location - 6041 South Blackstone Avenue, Chicago, Illinois
Operator - The University of Chicago

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The building is a one-story masonry structure without attachment to any other buildings. It is remotely located on the far southeast side of the university campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue (See Figure 1 and Figure 2).

The building occupies an area of 31 feet by 38 feet with finished concrete floor. To the east side of the building there is a fenced yard with a concrete patio. Inside the building it is subdivided into several areas (rooms), including a laboratory, to store chemicals of the same compatibility (flammable, reactive, toxic, and corrosive) and each room is labeled as such. The floor plan and designation of each area is shown in Figure 3.

2. Emergency Coordinators

Primary Coordinator: Steven Beaudoin
Director Safety and Environmental Affairs
115 Denell Drive
Crete, Illinois 60417
Office Phone: 773-702-9999
Home Phone: 708-672-6975

Alternate Coordinator: Krista Cooley
Associate Director Safety and Environmental Affairs
79 Oak Street
Valparaiso, Indiana 46383
Office Phone: 773-702-9999
Home Phone: 219-462-8592

Duties of Emergency Coordinators:

- Providing a "On-Call" Safety Officer twenty-four hours a day, seven days a week;
- Responding with appropriate action to control and remedy the incident;
- Responding to a reported incident in a timely manner;
- Maintaining liaison with the local Police and Fire Departments;
- Notifying Administration of an incident and providing periodic status reports;
- Reviewing and amending the Emergency Response Plan for Hazardous Materials; and
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When fire, explosion, or any unexpected release occurs, the facility operator or personnel should immediately:

- Notify other personnel in the building by voice. The facility is small enough that a voice amplification system is not required;
- Notify University Police by dialing 123 from a campus phone or 702-8181 from a non-campus phone;
- Notify emergency coordinator(s) listed on page 1.

4. Control Procedures

1. City Fire Department will respond immediately to any fire, explosion or release of hazardous materials. The Fire Department will contain and control any fire involved at the facility with the assistance of the emergency coordinator. Spill releases will be controlled through use of absorbent material such as vermiculite and spill control pillows.
2. Spill material with the absorbent will be picked up and placed in appropriate storage containers for disposal through the University of Chicago's waste disposal contractor. The facility operator will remove all waste from the spill area for ease of clean-up. The facility will not accept new waste until the spill or leak has been cleaned up and controlled.
3. All equipment and containers will be decontamination or replaced prior to resuming normal operation in the Laboratory Service Building following conclusion of emergency response and clean-up procedures.

5. Emergency Equipment

An emergency shower and eyewash are located by the doorway leading from the office/chemical sorting area, room 108, to the storage rooms. (See Figure 3 attached)

Two Class ABC fire extinguishers are located in the office/chemical sorting room and one Class D fire extinguisher is located in the hallway between the storage rooms. The facility is equipped with a smoke detector system that alarms directly at the Campus Police Department. Extinguishers are intended for use by staff during fire emergencies. These devices are needed to warn occupants of a fire and to summon the fire department.

Appendix A

Laboratory coats, face shields, and rubber gloves are located in the chemical sorting area. Neutralizers, absorbent material, safety goggles, scoops, base control, are located in the storage cabinets located adjacent to, across from and under the fume hood. These materials are necessary to ensure the safety of staff working in the facility during normal or emergency situations.

6. Evacuation Plan

Evacuation of the facility will be initiated by voice signal to personnel inside. Evacuation from the area will be made by Dorchester Avenue north to Midway Plaisance. Alternate evacuation route would be to go south on Dorchester Avenue.

7. Coordination Agreement Arrangements

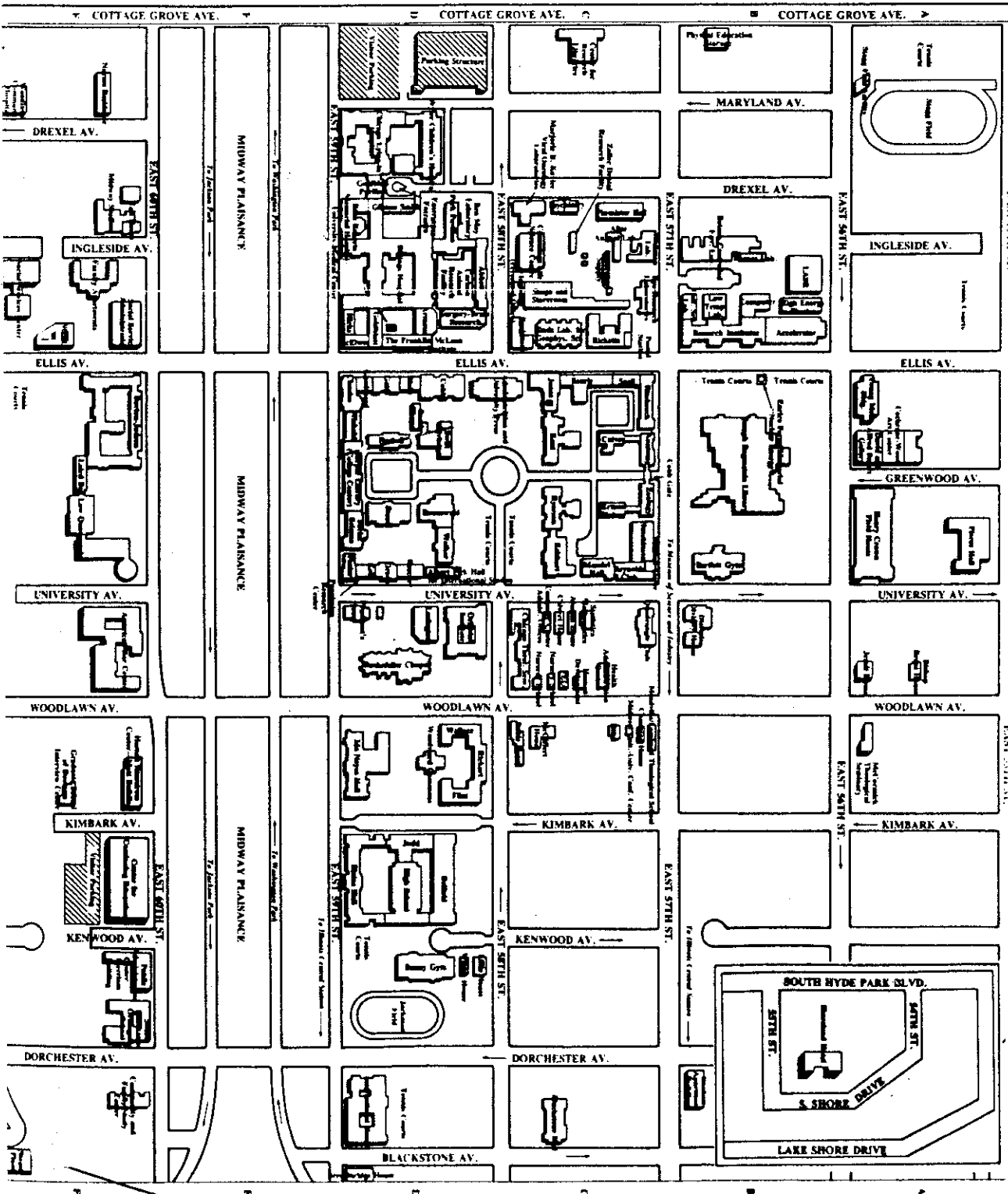
The University of Chicago maintains its Police Department and medical facility (The University of Chicago Medical Center). Arrangements have been made with the following response teams in case of an emergency. Copies of this Contingency Plan were sent to each agency.

- University of Chicago Police Department
5555 South Ellis Avenue
Phone: 702-8181
- The University of Chicago Medical Center
Emergency Care
Bernard Mitchell Hospital, 901 East 58th Street
Phone: 702-6250
- City of Chicago Police Department
District Commander
1121 South State Street
Chicago, Illinois
Phone: 744-4000
- City of Chicago Fire Department
District Chief
5955 South Ashland Avenue
Chicago, Illinois 60636
Phone: 747-5017
- City of Chicago Fire Department
Hazardous Materials Chief
558 West DeKoven Street
Chicago, Illinois 60607
Phone: 747-6582

8. Required Reports

A follow-up report detailing the incident, emergency response, clean-up, and actions taken to prevent reoccurrence will be prepared and submitted to the Illinois Environmental Protection Agency within 15 days of occurrence. All records concerning the incident and report will be maintained by the facility operator until three years after final closure of the Laboratory Service Building.

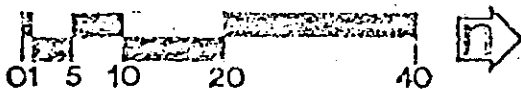
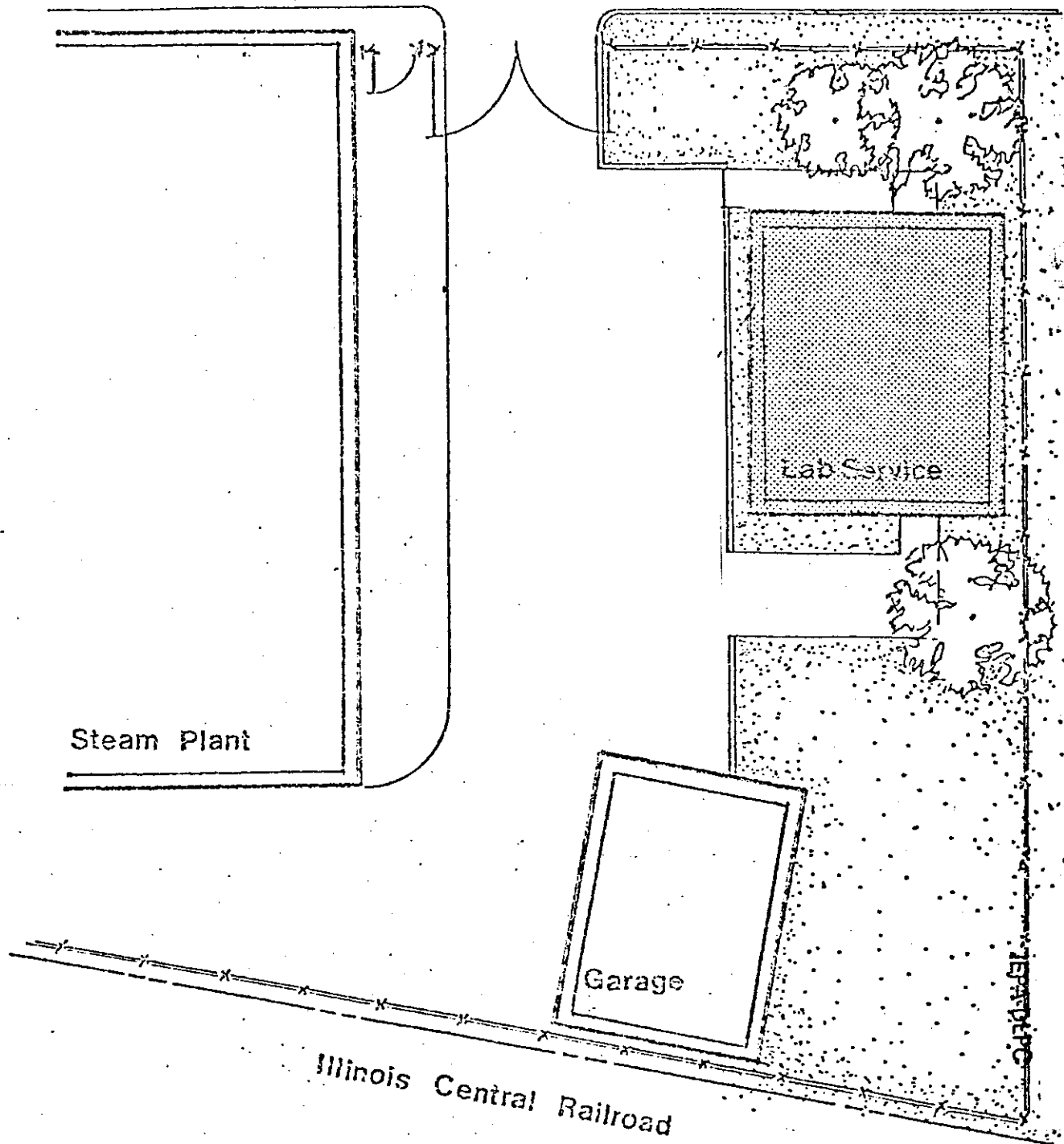
Fig. 1 University of Chicago Map



Laboratory Service Building

Fig. 2 Laboratory Service Building

S. Blackstone Ave.



Laboratory Service Building

THE UNIVERSITY OF CHICAGO
OFFICE OF THE ASSISTANT VICE-PRESIDENT
PHYSICAL PLANNING

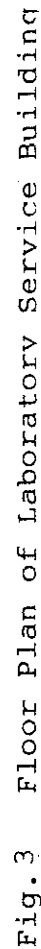


Fig. 3 Floor Plan of Laboratory Service Building

Appendix B



The University Of Chicago
.Risk Management, Audit and Safety.
Safety and Environmental Affairs
5555 South Ellis Avenue, Chicago, Illinois
60637

Date: November 5, 2004
To: Facility Managers (See Distribution)
From: Steven Beaudoin
Director Safety and Environmental Affairs
Re: **Laboratory Hazardous Waste Procedures**

The University of Chicago was recently inspected by the Federal Environmental Protection Agency (EPA). As a result of that inspection, issues in the laboratories were identified that need to be addressed. To comply with Federal and State Environmental Protection Agency regulations the following procedures shall be followed with regards to hazardous waste generated in the laboratories;

- Waste containers shall always be kept closed except when it is necessary to add or remove waste; and
- Containers used for the collection of hazardous waste shall be marked with the words "Hazardous Waste", or other words that identify the contents of the container. Labels can be picked-up at the Safety and Environmental Affairs Office located at 5555 South Ellis Avenue.

Please make sure that this information gets distributed to Principle Investigators in your department. If you have questions or concerns please feel free to contact Safety and Environmental Affairs at 702-9999. Thank you.

Distribution

Don Churilla
Gerry Curtis
Vera Dragisich
Dwight Jackson
Judd Johnson
Skip Johnson
Brian Lynch
John Phillips
Tony Wilson

Appendix C



The University Of Chicago
Risk Management, Audit and Safety.
Safety and Environmental Affairs
5555 South Ellis Avenue, Chicago, Illinois 60637

Laboratory Services Building

Job title Related to Hazardous Waste Management	Employee Filling the Title
On-Scene Incident Commander	Steven Beaudoin
Alternate On-Scene Incident Commander	Krista Cooley
Hazardous Materials Technicians	Carrie Eder
	Melissa Gilmore
	Ryan VanDeWoestyne
Contractor	Wilpen Environmental

Job Descriptions

On-Scene Incident Commander

The Director of Safety and Safety and Environmental Affairs or Associate Director shall be the On-Scene Incident Commander. In the absence of the above On-Scene Incident Commander, the most senior Hazardous Materials Technician shall assume the On-Scene Incident Commander duties.

Duties may include:

1. Activating the Emergency Response Plan for Hazardous Materials and Hazardous Materials Response Team;
2. Identifying hazards and risks involved in an emergency response situation;
3. Activating internal facility alarms or communication systems to notify all applicable personnel;
4. Notifying, if needed, the Police Department, Fire Department, and any applicable State and Federal organizations;
5. Should the event involve a select Biological Agent and toxin, sending written confirmation of the incident to the CDC/APHIS;
6. Assuming overall authority for managing the emergency unless higher command arrives (e.g., Fire Department Chief);
7. Performing emergency response termination procedures; and
8. Conducting emergency response critique and arranging follow-up procedures.

Appendix C

Hazardous Materials Technician

The Hazardous Materials Technicians include staff from Safety and Environmental Affairs and Radiation Safety (Associate Director, Industrial Hygienists, Safety Officer and Radiation Safety Officers).

The Hazardous Materials Technician shall perform all duties assigned by the On-Scene Incident Commander consistent with his/her training.

Duties of the Hazardous Materials Technician may include:

1. Implementing the Emergency Response Plan for Hazardous Materials;
2. Selecting and using monitoring equipment;
3. Selecting and using specialized personal protective equipment (PPE);
4. Performing advanced control, containment and/or confinement operations;
5. Implementing decontamination procedures;
6. Participating in hazard and risk assessment of the site and termination procedures; and
7. Participating in the development of site safety and control plan.

One Hazardous Materials Technician shall be given the title of *Entry Team Leader*. The Entry Team Leader shall be chosen by the On-Scene Incident Commander.

Duties of the *Entry Team Leader* may include:

1. Coordinating emergency response zones with the On-Scene Incident Commander;
2. Coordinating entry plans with the On-Scene Incident Commander;
3. Coordinating decontamination activities with the On-Scene Incident Commander; and
4. Supervising entry team activities.

Contractor

The contractor includes staff from Wilpen Environmental. Wilpen is contracted by the University of Chicago to collect waste at the satellite locations, deliver it to the lab services building and prepare the waste for shipment.

Training Requirements

On-Scene Incident Commander

The On-Scene Incident Commander shall be a trained Hazardous Materials Technician. A minimum of eight hours On-Scene Incident Commander training or equivalent experience is required initially and eight hours of continuing education annually thereafter. The training shall include:

1. Risks associated with hazardous material incidents;
2. Potential outcomes of hazardous material incidents;
3. Advanced hazard and risk assessment techniques;
4. The selection and usage of personal protective equipment;
5. Advanced control, containment and confinement operations;
6. Decontamination procedures; and
7. The resources available during an incident.

Appendix C

Hazardous Materials Technician

The Hazardous Material Technician shall be required to complete 24 hours of required training and eight hours of continuing education annually thereafter. The training shall include:

1. Identifying hazardous materials;
2. Risks associated with hazardous material incidents;
3. The incident command system;
4. Advanced control, containment and confinement operations;
5. Advanced decontamination procedures; and
6. The classification, identification and verification of known and unknown materials.



Todd Brown/R5/USEPA/US

09/01/2004 03:00 PM

To

Subject LQG Check List

Dear Rebecca:

I have attached the Illinois Environmental Protection Agency's Large Quantity Generator (LQG) Checklist per your request. This is the type of checklist that EPA inspectors use when they perform inspections at LQGs. Please note that the checklist is **not** intended to be a comprehensive list of all hazardous waste regulations that a facility must follow. The checklist is only intended for use as a **general guide** for inspectors during an inspection, and at my office we are required to fill one out. Therefore, I must add a disclaimer here that UC's compliance with everything on the checklist **does not in any way guarantee compliance with all of the Illinois Hazardous Waste Regulations or federal regulations** that UC is subject to, nor does compliance with everything on the checklist waive or otherwise affect any of the U.S. EPA's rights to pursue an enforcement action in the future against UC for violations of RCRA regulations not included on the check list .

However, I do believe that the enclosed checklist will be helpful to your office. Please let me know if you have any problems opening the file I have attached.



722lqg.doc.zip

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Waste, Pesticides, and Toxics Division
Enforcement and Compliance Assurance Branch
Mail Code DE-9J
77 W. Jackson Blvd.
Chicago IL, 60604
(312) 886-6091
FAX (312) 353-4342
brown.todd@epa.gov



Paul Purseglove
<Paul.Purseglove@epa.state.i
l.us>

To
Subject Re: Permission to hand out a checklist

09/01/2004 01:34 PM

Mr. Brown, no problem, feel free to give them a copy of the checklist

Purse

>>> <Brown.Todd@epamail.epa.gov> 08/31/04 3:47 PM >>>

Dear Mr. Grigalauski, Mr. Marvel, and Mr. Purseglove,

Last week I performed a RCRA inspection at the University of Chicago. During that inspection, a member of UC's Safety and Environmental Affairs Office, asked for a blank copy of the Part 722 LQG checklist that I was using during the inspection. She wanted one for her own reference. I explained that I would need to ask my management first.

My supervisor and I feel that there would be no harm in giving a checklist to UC for their own use. However, EPA's Office of Regional Counsel (ORC) is currently considering the legal implications of giving UC the checklist. Therefore, as of yet, I have not given the checklist to UC. Also, ORC suggested that I get IEPA's permission first, since it is an IEPA checklist that we use. Please let me know if IEPA has any objections to EPA giving UC a blank copy of the Part 722 LQG Checklist. I have attached the checklist here so you can see exactly what it is that I am proposing to give UC. If you have any questions or concerns you can contact my supervisor, Lorna Jereza, at (312) 353-5110, or myself at the number below.

(See attached file: 722lqg.doc.zip)

Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Waste, Pesticides, and Toxics Division
Enforcement and Compliance Assurance Branch
Mail Code DE-9J
77 W. Jackson Blvd.
Chicago IL, 60604
(312) 886-6091
FAX (312) 353-4342
brown.todd@epa.gov



Todd Marvel
<Todd.Marvel@epa.state.il.us>

08/31/2004 04:07 PM

To
Subject Re: Permission to hand out a checklist

IEPA has no problem with you giving out our blank checklist. In fact, we encourage the distribution of our checklists as a means to improve understanding of the requirements we evaluate during an inspection and as a means to improve compliance rates within the regulated community.

>>> <Brown.Todd@epamail.epa.gov> 08/31/04 03:47PM >>>

Dear Mr. Grigalauski, Mr. Marvel, and Mr. Purseglove,

Last week I performed a RCRA inspection at the University of Chicago. During that inspection, a member of UC's Safety and Environmental Affairs Office, asked for a blank copy of the Part 722 LQG checklist that I was using during the inspection. She wanted one for her own reference. I explained that I would need to ask my management first.

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is an IEPA checklist that we use. Please let me know if IEPA has any objections to EPA giving UC a blank copy of the Part 722 LQG Checklist.

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Sincerely,

Todd C. Brown
U.S. EPA - Region 5
Waste, Pesticides, and Toxics Division
Enforcement and Compliance Assurance Branch
Mail Code DE-9J
77 W. Jackson Blvd.
Chicago IL, 60604
(312) 886-6091
FAX (312) 353-4342
brown.todd@epa.gov

**U.S. E/PA REGION 5
WASTE, PESTICIDES AND TOXICS DIVISION
ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH**

COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: University of Chicago

FACILITY U.S. EPA ID NO.: ILD 005 421 136

FACILITY TYPE: Large Quantity Generator

FACILITY ADDRESS: Administration Building
5801 South Ellis Avenue
Chicago, IL 60637

Offices of Safety, Environmental Affairs and
Radiation Safety
5555 South Ellis Avenue
Chicago, IL 60637

FACILITY REPRESENTATIVES: Steven Beaudoin
Director
Offices of Safety, Environmental Affairs and
Radiation Safety
(773) 834-1131
(773) 702-6546 Facsimile
sbeaudoi@uchicago.edu

Rebecca Bratt
Industrial Hygienist
Safety and Environmental Affairs
(773) 702-5663
(773) 702-6546 Facsimile
rbratt@uchicago.edu

Ryan M. VanDeWoestyne
Safety Officer
Safety and Environmental Affairs
(773) 702-0711
(773) 702-6546 Facsimile
ryanv@uchicago.edu

Carrie Eder

Industrial Hygienist
Safety and Environmental Affairs
(773) 702-0711
(773) 702-6546
ederc@uchicago.edu

U.S. EPA REPRESENTATIVE:

Todd C. Brown
Environmental Scientist
DE-9J
Compliance Section 1
(312) 886-6091
(312) 353-4342 Facsimile
brown.todd@epa.gov

DATES OF INSPECTION:

August 26-27, 2004

NAIC (SIC) CODE:

62211 - General Medical and Surgical Hospitals
61131 - Colleges, Universities, and Professional

S
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l
s

**INSPECTION PRIORITY,
SECTOR, AND/OR PROCESS:**

University Initiative/Generator Requirements

PREPARED BY:

Todd C. Brown

I. Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the facility to determine its compliance with the Resource Conservation and Recovery Act (RCRA), with respect to the facility's management of hazardous waste. The purpose of this report is to document the CEI and the facility's compliance status.

II. Facility Description/Back Ground

The University of Chicago (UC) main campus is located in the Hyde Park neighborhood on the south side of Chicago, IL. The approximate boundaries of the campus span north-south from 55th Street to 61st Street, and east-west from Lake Shore Drive to Cottage Grove Avenue (Attachment A; general campus map). UC is an educational institution operating a university including a college, graduate departments, professional schools, primary and secondary schools, libraries, shops, educational research departments, a school of medicine, and hospitals and clinics. The facility is currently a Large Quantity Generator (LQG) of hazardous waste.

UC first notified the United States Environmental Protection Agency (EPA) of its hazardous waste activities in August of 1980. UC filed a Part A permit application in November of 1980 for the on-site container storage of hazardous waste generated at UC, and for the treatment of hazardous waste in tanks and incinerators. However, in a subsequent letter to the EPA dated October 2, 1981, UC stated that they were not treating hazardous waste on-site in incinerators or any other units, and only engaged in the on-site storage of hazardous waste. UC was granted interim status by the EPA on March 10, 1982. UC filed an amended Part A permit application received by EPA on August 1, 1984. The amended Part A did not include incineration and tank treatment of hazardous waste, and added neutralization, hydrolysis, oxidation, precipitation, dissolution, and distillation as hazardous waste treatment methods. UC filed another amended Part A permit application dated December 3, 1990. This application indicated that UC's only hazardous waste operations were the on-site storage of hazardous waste, and treatment of acids and bases using hydrolysis and neutralization. The above mentioned Part A applications indicated that the interim status activities were mainly confined to the George Herbert Jones Laboratory on 57th Street and Ellis Avenue, the Franklin McLean Research Institute Block House on 58th Street and Ellis Avenue, the Laboratory Services Building on 60th Street and Blackstone Avenue, and the Research Institute on the northwest corner of 57th Street and Ellis Avenue.

57th Ellis
58th Ellis
57th Ellis

UC was issued a Part B permit from the Illinois Environmental Protection Agency (IEPA) on July 15, 1991. The Permit was for the storage of hazardous waste in the Laboratory Services Building on 60th Street and Blackstone Avenue. Attachment B shows the layout of the Laboratory Services Building. The building is a concrete block structure that contains four rooms for the segregated storage of hazardous waste; (1) Flammable Room, (2) Toxic Room, (3) Reactive Room, and (4) Corrosive Room. The Part B permit allowed UC to store up to 4,600 gallons of hazardous and nonhazardous waste in the building. This building acts as the central storage facility for all of UC's hazardous waste derived from its laboratories and affiliated hospitals. The hazardous wastes accumulated in this building are stored in containers. The storage permit expired on August 19, 2001, and was not renewed by UC. A memo from Anna Van Orden, an inspector at IEPA, to Rob Watson, Permits, IEPA, dated October 30, 2002, indicates that UC submitted a Closure Plan to IEPA in February of 2002, and that UC had no intention of continuing as a Part B facility (Attachment C). According to a telephone discussion I had with Mr. Watson prior to my inspection of UC, IEPA had not yet been

60th +
Blackstone

able to process UC's closure. UC currently still uses the Laboratory Services Building as its central accumulation area for hazardous waste.

The hazardous wastes that UC accumulates in the Laboratory Services Building are mainly derived from its teaching and research laboratories. During the opening conference of the inspection, Steven Beaudoin, Director of the Offices of Safety, Environmental Affairs and Radiation Safety, stated that there are approximately 1,200 laboratories that can periodically generate hazardous waste. UC's last Annual Report to the IEPA is given in attachment D. The hazardous wastes generated at UC and applicable hazardous waste codes, as reported on the Annual Report, are listed below in Table 1.

Table 1. Hazardous Wastes Generated by UC in the Year 2003.

Waste Description	EPA Hazardous Waste Codes
Halogenated Solvents	D001, F002, F003, F005, D018
Scintillation Vials with Xylene and Toluene	D001, F003, F005
Lab Packs	LABP
Sodium Hypochlorite	D002
Mercury	D009
Lead Acid Batteries	D002, D008
Fluorescent Light Bulbs	D009
Gas Cylinders - Organic	LABP
Gas Cylinders - Inorganic	LABP
Nickel Cadmium Batteries	D006
P- Listed Lab Packs	LABP
Lead	D008
Lithium Batteries	D003
Mercuric Chloride Solution	D009
Silver Solution	D011
Sulfuric Acid	D002

Table 1. Hazardous Wastes Generated by UC in the Year 2003.

Waste Description	EPA Hazardous Waste Codes
Halogenated Solvents	D001, F002, F003, F005, D018
Sodium Hydroxide Solution	D002
Hydroxyphosphonoacetic Acid	D002
Sodium Bisulfate Solution	D002
Hydrochloric Acid	D002

According to Mr. Beaudoin, major generators of hazardous waste at UC are the Cummings Life Science Center (920 E. 58th St.), Searle Chemistry Laboratory (5735 S. Ellis Ave.), and the Biological Sciences Learning Center (924 E. 57th St.). Other generators include the George Herbert Jones Laboratory (5747 S. Ellis Ave.), Henry Hinds Laboratory for the Geophysical Sciences (5734 S. Ellis Ave), the UC hospital, BPSB, UC's paint shop in the ATS building, and other laboratories. The majority of the hazardous waste consists of unused chemicals or spent chemical wastes. Some solvent wastes are generated from the hospital.

Hazardous wastes at the generation points are stored in liter-sized bottles or 5-gallon buckets. UC employs the services of Wilpen Environmental Services, Inc. (Wilpen), 4750 N. Milwaukee Ave. Chicago IL, for the on-site management of UC's hazardous waste. On Thursdays, Wilpen employees come to UC and collect the hazardous wastes from the various generation points that have notified the Office of Safety and Environmental Affairs that a pick up is needed. Wilpen then transports the wastes directly to the Laboratory Services Building. At that point, a determination is made as to whether the material is a waste, a hazardous waste, or a reusable material. The hazardous wastes are then stored in the Laboratory Services Building until they are shipped off-site for further management. According to UC's manifests and annual reports, UC uses Midwest Environmental Transport, Inc., Cincinnati, Ohio, as its hazardous waste transporter, and ships the hazardous waste to Environmental Enterprises, Inc., Cincinnati, Ohio.

III. Opening Conference

I arrived at the Office of Safety and Environmental Affairs located at 5555 S. Ellis Avenue at approximately 9:15 A.M. and met with Steven Beaudoin, Director of the Offices of Safety, Environmental Affairs and Radiation Safety, and held an opening conference. I presented my credentials and explained to Mr. Beaudoin that I was there to perform a hazardous waste inspection. During the opening conference, Mr. Beaudoin explained that all of UC's hazardous waste is accumulated in the Laboratory Services Building, and described the major generation points on campus, as described in the Introduction of this report. Also, as described in the Introduction, Mr. Beaudoin

Lib Science
920 E.
58th St.
Searle
5735 S.
Ellis
Bio Sci
Learn.
Ctr.
924 E
57th
Jones Lab
5747 S.
Ellis.
Henry Hinds
Lab
5734 S.
Ellis

explained that no UC employees handle hazardous waste, and that all of the handling is performed by Wilpen. Mr. Beaudoin confirmed that UC is an LQG, and that UC did not import or export any hazardous waste. I asked if UC handled any mixed wastes (low level radioactive waste mixed with hazardous wastes). Mr. Beaudoin explained that any radioactive materials such as scintillation vials of tritium and ^{14}C , have short half lives, and are allowed to decay before they are managed with hazardous wastes. Mr. Beaudoin also explained that UC has never used incinerators for management of hazardous waste. He also explained that he did not think UC generated any used oil, but could not be sure. Mr. Beaudoin stated that the Safety and Environmental Affairs Office conducted the weekly inspections of the Laboratory Services Building, though all other hazardous waste management was carried out by Wilpen. Mr. Beaudoin explained that all of the safety personnel are Haz Mat Level A certified, and that this training is renewed each year.

I explained that I would like to perform visual inspections of the Laboratory Services Building, the Paint Shop, the Jones Research Facility, the Cummings Life Science Center, the Searle Chemistry Laboratories, and the Biological Sciences Learning Center.

I also explained that after the site inspections, I would need to review manifests, waste analysis, annual reports, inspection records, the contingency plan, and training records. Mr. Beaudoin explained that the inspection records were located in the Laboratory Services Building. After the opening conference, Mr. Beaudoin, Rebecca Bratt (Industrial Hygienist, Safety and Environmental Affairs), Ryan VanDeWoestyne (Safety Officer, Safety and Environmental Affairs), Carrie Eder (Industrial Hygienist, Safety and Environmental Affairs), and I, prepared for the site inspection.

IV. Visual Site Inspection

A. Laboratory Services Building

Mr. Beaudoin, Ms. Bratt, Mr. VanDeWoestyne, Ms. Eder, and I all drove to the Laboratory Services Building in a UC vehicle. The building is equipped with an alarm system, and a surveillance camera monitors a locked fence that blocks the driveway to the building. When we arrived at the building, a Wilpen contractor was just leaving. I began my inspection of this building in the area labeled as "Laboratory" in Attachment B. Emergency equipment, safety gear, and spill control equipment are located in this room. A telephone and sinks for running water are also present. I inspected the safety equipment located in cabinets in the Laboratory. Photographs 1-3 (Attachment E) are of some of the safety/spill control equipment. Included in this equipment are neutralizers, adsorbent material, safety goggles, gloves, scoops, base control, and numerous other items. A fire extinguisher is also present in this room.

We then moved to the Flammable Storage Room marked "Flammable Liquids" on Attachment B. Hazardous wastes were being accumulated in 55-gallon containers, 5-gallon buckets, and various small glass bottles that appeared to be the original manufacturer's bottles for the chemicals they contained.

Photograph 4 is of a shelf in the flammable storage room that stored six 5-gallon buckets of hazardous waste, and a few small glass bottles of waste chemicals. The 5-gallon buckets were all labeled with the words, "Hazardous Waste," and with accumulation dates. Four of the buckets in photograph #4 were labeled U133 hydrozene anhydrous, P003 acrolein dimer, D001-D002 perchloric acid, and D002-D003-D022 bromine. None of the small bottles in photograph 4 were labeled with the words, "Hazardous Waste," nor were they labeled with accumulation dates. Photograph 5 is a close up of the bottle featured on the top shelf in photograph 4. This bottle had a pinkish colored material coating its exterior. Ms. Bratt believed the bottle contained nitric acid and had been involved in a spill.

Photograph 6 is of another shelving unit holding various waste chemicals in their original containers. None of these chemicals were labeled with the words, "Hazardous Waste," or accumulation dates. Photograph 7 is a close up of some of the chemicals on the bottom shelf and photograph 8 is a close up of some the chemicals on the top shelf. Among the chemicals present on these shelves were bottles labeled allylmagnesium bromide (with the word "Bad" written on it), cuy cumin, ammonium sulfide, potassium butyl borrohydride, triethyl amine DT, 1-isopropyl amines, 4-nitrobenzo alocohol. Mr. Beaudoin was not sure if all of the chemicals in the bottles had been designated as wastes yet. At this point, he said he was going to call their waste contractor, Wilpen, and find out how long the bottles had been there, and what was going to happen with them. Given that this was a Thursday, Wilpen was on campus.

Across from the above-mentioned shelves were two 55-gallon containers of hazardous waste; one labeled as xylene, and the other as xylene and benzene (photograph 9). The containers were closed, in good condition, and were properly labeled and dated. Photograph 10 is of the label on the container of xylene and benzene waste. Also present in the Flammable Storage Room, was one 55-gallon container of lab packed hazardous waste with an unsecured lid (photographs 11 and 12). At this time Mr. Beaudoin secured the lid. I also observed two 55-gallon containers of acetic acid and chloroform hazardous wastes. The containers were closed, labeled, dated, and appeared to be in good condition.

We next moved to the Toxic Storage Room which is a small 4' X 4' room labeled "Toxic Mat'l" on Attachment B. Four 5-gallon buckets of hazardous waste were present in this room. They were labeled with the words, "Hazardous Waste," and had accumulation dates from June and July of 2004. One of the buckets was labeled as containing mercury and acetone, with the waste codes D001, D009, and F003. The other three buckets were labeled as containing mercury, and had the waste code D009. There were also two 4-liter bottles labeled as containing mercury and nitric acid. Another 4-liter bottle was present and labeled as

containing mercury in acetone with sulfur. The three 4-liter bottles are featured on the top shelf in photograph 14. Also featured in the photograph, on the same shelf, to the right of the 4-liter bottles, is a smaller, amber colored bottle that had the word "silver" written on it. None of these bottles were labeled with the words, "Hazardous Waste," or with accumulation dates. On the second from the bottom shelf was an assortment of small bottles containing chemical wastes in what appeared to be the original manufacturer's bottle (photograph 13). A close up of these bottles is provided in photograph 14. Among the bottles, were bottles labeled silver nitrate, silver(II)oxide, hydrogen peroxide, strontium nitrate, and sodium meta periodate. None of these bottles were labeled with the words, "Hazardous Waste," or with accumulation dates.

Next I inspected the Reactive Storage Room. This is also 4'X4' room, and is directly adjacent to the Toxic Storage Room. However, the map of the Laboratory Services building in Attachment B labels this room as "Corrosive," and places the "Reactive" storage one over. In this room I observed three buckets of hazardous waste labeled D001-D003 sodium hydrous sulfite, D001-D003 picric acid, and D001-D003 sodium sulfide anhydrous. These buckets were labeled with the words, "Hazardous Waste," and had accumulation dates on them. This room also contained an assortment of waste chemicals in what appeared to be the original manufacturer's bottle, which were not labeled with the words, "Hazardous Waste," or with accumulation dates. Photograph 15 features the assortment of small bottles on a shelf in the Reactive Storage Room. Among them, were bottles labeled waste NaCN, 3M sodium thiosulfate, sodium thiocyanate, and RNA STAT GO. There were also two jars labeled Raney Ni Waste.

I next inspected the Corrosive Storage Room. This is again a small 4'X4' room, and is adjacent to the Reactive Storage Room (however, it is labeled "Reactive" on Attachment B). One 55-gallon container of sodium hydroxide hazardous waste (D002) was present, labeled with the words, "Hazardous Waste," and marked with an accumulation date (photograph 16). I also observed in this room one bucket and one 4-liter bottle, both labeled as containing sulfuric acid (indicated by H_2SO_4 ; photograph 17). Both the bucket and the bottle were not labeled with the words, "Hazardous Waste," or with accumulation dates.

At this point Mr. Beaudoin had been able to contact Todd Herbig, an employee of Wilpen, to find out why the Laboratory Services Building contained various bottles of waste chemicals that were not labeled and dated. Mr. Beaudoin explained that Mr. Herbig was in the process of lab packing all of these bottles prior to my coming there for an inspection. This was a Thursday, which is the normal day that Wilpen comes to UC to pick up hazardous waste from the generation points, brings the waste to the Laboratory

Services Building, and determines how they should be further managed. Mr. Beaudoin explained that the bottles would all be in containers by the end of the day.

We then moved to a drum staging area in the building. This room is labeled as "Storage 55 Gallon Drums" on Attachment B. In this room, I observed containers (55-gallon and less) of hazardous wastes consisting of xylene and benzene, hexane, xylene and toluene, chromic acid, and chloroform. All of the containers holding hazardous waste were properly labeled and appeared to be in good condition. A few of the chloroform containers (brown ones in photograph 18), were stored such that the labels could not be seen without moving them. Mr. Beaudoin, promptly corrected this. Photographs 18 and 19 are of containers of both hazardous and nonhazardous wastes in this room. I also observed a small stack of fluorescent light bulbs on the floor. They were not in a container and they were not labeled as Universal Waste. According to UC, they were going to be recycled.

This concluded my inspection of the Laboratory Services Building. I left there at approximately 10:40 A.M.

B. *Biological Sciences Learning Center*

After I finished with my inspection of the Laboratory Services Building, we went back to the 5555 S. Ellis building to return the UC vehicle. Then Mr. Beaudoin, Ms. Bratt, Ms. Eder, and I went on foot to the Biological Sciences Learning Center. I inspected two laboratories on each of the first and second floors. On the first floor, spill control equipment, an emergency shower, eye wash, and fire extinguishers were located in the hallway. In Rm. 102, I observed one small bottle (liter sized) of chloroform waste (isoamyl chloroform). The bottle was located in a hood, was labeled as isoamyl chloroform, and was closed. I also observed one small bottle of labeled organic waste, also in a hood, and closed. According to a person in the lab, it contained organic solvent waste. In Rm. 122, I observed a 4-liter bottle containing xylene waste in it. It was also located under a hood. The bottle was open. On the second floor, in Rm. 222, I observed a 1-gallon container of waste marked as DAB waste. In Rm. 222, I observed bottles of xylene waste and chloroform waste under hoods. The bottles were labeled as to their contents. I also observed a bucket used to accumulate solid waste that comes into contact with chloroform. The bucket was not labeled.

After my inspection of these labs, we all returned to the 5555 South Ellis Building. We then took a break for lunch and agreed to meet back there when we were finished.

C. *Searle Chemistry Laboratories / George Herbert Jones Laboratory*

After my lunch, I began reviewing UC's manifest records while I waited for everyone to arrive. The manifests are stored in a metal cabinet in the Safety and Environmental Affairs Office. See Section V.A. for details on the manifest review.

Mr. Beaudoin, Ms. Bratt, Ms. Eder, and I, then walked to the Searle Chemistry laboratories building located at 5735 S. Ellis. Mr. Beaudoin departed from the group at this point. This building is also attached to the George Herbert Jones Laboratory whose address is 5747 S. Ellis Ave. I began my inspection of laboratories on the fourth floor. Showers, eyewash stations, fire extinguishers, and spill kits were located in the hallways of the building. In Rm. 406, waste chemicals are accumulated in small bottles under fume hoods, and are usually segregated into different bottles as organic, aqueous, and acidic waste. I observed two 4-liter bottles of waste chemicals under a fume hood that were open and not labeled. The person I spoke with at the lab, Ed Stebarg, was not exactly sure what was in them. I also observed five 4-liter bottles of chemical wastes that were again not labeled and open under a fume hood.

In Rm. 414, wastes were being collected under fume hoods in bottles. The types of waste are segregated as organic, acidic aqueous, and aqueous wastes. I observed one 4-liter bottle of chemical waste under a hood unlabeled and open, and four 4-liter bottles of chemical waste under another hood open and unlabeled.

In Rm. 454 I observed one 4-liter bottle of waste chemicals in a hood that was open. I also observed three other waste bottles containing organic waste under a hood. Two of them were open. In room 462 I observed a bottle of ethanol waste not labeled and open, again under a hood.

We then crossed over to the fourth floor of the George Herbert Jones Laboratory. Here I observed organic solvent waste bottles in Rm. 401. We then crossed back over to Searle and went to the third floor. On the third floor I first visited Rm. 362 and did not observe any wastes. I then went to Rm. 354 and observed one bottle of aqueous waste under a fume hood that was open. Also under a fume hood, was a small bottle of organic waste that was not labeled. In Rm. 346, I observed one unlabeled 20 L container of waste chemical. In Rm. 306 I observed one 4-liter bottle of organic solvent waste that was not labeled.

We then went to the second floor. In Rm. 285, I observed one 4-liter bottle under a hood labeled waste that was open and did not have a clear description of its contents. In Rm. 205 I observed three bottles of chemical wastes that were unlabeled and open under a fume hood. According to a researcher in the lab, one bottle was for acidic waste, another for chlorinated solvents, and another for non-chlorinated solvents. The person in the laboratory stated that he could not close the bottle of acidic. He stated the bottle could explode do to a build-up of pressure. Ms. Bratt then explained that some of the labs have a compound in the acidic waste that causes pressure to build up. She stated that a few weeks ago, a bottle had exploded in a cabinet.

D. Cummings Life Science Center

After my inspection of the Searle Chemistry Laboratories, we headed on foot to the Cummings Life Science Center. Spill control kits and fire extinguishers were again present in the

building. In Rm. 1001 I observed no hazardous waste. In Rm. 515 I only observed biohazard wastes. In Rm. 221 I observed one 4-liter container of acetonitrile waste under a fume hood that was open. Mr. Beaudoin joined us briefly during my inspection of this building.

E. UC Paint Shop

After my inspection of the Cummings Life Science Center, Ms. Bratt, Ms. Eder, and I went back to the 5555 South Ellis Building to retrieve the UC vehicle so we could drive to UC's paint shop.

The paint shop is located at 5620 South Stoney Island. In the building I observed one 55-gallon container of organic solvent waste. According to an employee in this building, no spill control equipment is available. An eyewash station was present.

V. Record Review

After my inspection of the UC Paint Shop, we all headed back to the 5555 South Ellis building so I could perform the record review portion of the inspection.

A. Manifest Review

I began by resuming the manifest review. Manifests were only available on file dating back to August 12, 2002. UC was unable to locate previous manifests. Mr. Beaudoin and Ms. Bratt explained that they had recently moved their office to this building, and that it was possible that the manifests could have been disposed of during the move. Land Disposal Restriction Notification forms accompanied manifests for hazardous waste shipments that I reviewed. All of the manifests listed Environmental Enterprises Inc., as the designated facility, and Environmental Transporters as the transporter. IL manifest number 10130063 signed by the generator on August 12, 2004, and by the transporter on August 17, 2004, only included the generator copy. The manifest included 100 G of diaminobenzidine without a waste code. IL state manifest number 10130064 lists 210 gallons of formaldehyde waste without an EPA waste code. Attached to the manifest were 7 sheets of paper, which appeared to be used for recording pickups of containers, that each listed 30 gallons of formaldehyde derived from the UC hospital. IL manifest number 10161863 also listed 240 gallons of formaldehyde waste without an EPA waste code. This manifest was signed by the generator on July 10, 2003. I asked Ms. Bratt why these formaldehyde shipments did not indicate an EPA waste code, and explained that if the formaldehyde is an unused commercial chemical product, it should carry the waste code U122. Ms. Bratt contacted Wilpen, to inquire about the formaldehyde shipments. After speaking with Wilpen, Ms. Bratt explained that the formaldehyde is used by the hospital to preserve tissue. Once they are done with the tissue, the formaldehyde is drained so the tissues can be disposed of. The formaldehyde ultimately gets incinerated. The manifests for the formaldehyde shipments listed Environmental Enterprises, Inc., as the designated facility.

I left UC around 4:20 P.M. and explained to Ms. Bratt that I would return the next morning, around 8:00 A.M., to finish the record review. I returned to the 5555 S. Ellis building the next morning (August 27, 2004) around 8:00 A.M. and began looking at UC's contingency Plan. The facility has on file a contingency plan for the Laboratory Services building. However, the UC website also has emergency procedure plans and safety information online. This information can be found at <http://chemistry.uchicago.edu/safety.shtml>. Ms. Bratt printed out a copy of Section 3.5 of the Emergency Response Plan for Hazardous Materials. She also made a photo copy of UC's emergency contact list (internal and external) along with a list of emergency spill response items. These lists, and the Emergency Response Plan for Hazardous Materials, and the are kept in binders that are used by the Safety and Environmental Affairs employees when responding to incidents. I chose to take copies of the contingency plan and emergency response plan back to the office for further review. (See Section V.D.)

B. Financial Assurance Records

While at UC, I reviewed the facility's financial assurance documents. UC uses a financial test to fulfil the financial assurance requirements for the Laboratory Services Building, whose closure as a Part B permitted facility is not yet approved by IEPA (See Section II). The financial assurance document I reviewed consisted of a letter/work sheet to the IEPA from UC's Chief Financial Officer, Donald J. Reaves. The document appears to indicate that UC has the required financial assurance for closure, post-closure, and annual aggregate liability. The worksheet is accompanied by a letter to IEPA from Mr. Beaudoin indicating that the financial assurance documents were submitted to IEPA along with an independent auditor's report.

C. Annual Reports

Annual Reports were on file at UC dating back to the year 2000. The reports all appear to have been submitted by the required dead line. The annual report for the 2004 Reporting Year is given in Attachment D.

D. Contingency Plan

UC has on file a contingency plan that is specific to the Laboratory Services Building, where all of UC's hazardous waste is eventually stored. A copy of the plan was obtained during the inspection and reviewed back at my office. The plan was last revised on May 10, 1989, with the exception of the addition of two new emergency coordinators in November of 2002 (Attachment F). The deficiencies in the plan are as follows.

- The contingency plan does not include the home addresses of the two current emergency coordinators; Steven Beaudoin and Rebecca Bratt. The address listed for both of them is for

the Safety and Environmental Affairs Office at 5555 South Ellis Avenue.

- The contingency plan still lists the names of two former emergency coordinators, Dr. Sam Wang and Dr. Roy Mackal.
- The list of emergency equipment is not up to date. I observed emergency equipment while inspecting the Laboratory Services Building that is not described in the plan (Section IV.A.).

The UC website also has emergency procedure plans and safety information online. This information can be found at <http://chemistry.uchicago.edu/safety.shtml>. One of the documents available on this website is entitled "Safety Manual" and is located under "Chemical Spill Response." Section 3.5 of this manual, Emergency Response Plan for Hazardous Materials, is used by the Office of Safety and Environmental Affairs and kept in a binder along with an emergency contact list (internal and external) and a list of emergency response items. I obtained a copy of these documents during the inspection and reviewed them back at my office (Attachment G). The plan states that it pertains to any hazardous chemical release, select agent release, confirmed fire, serious injury or death resulting from the release of a hazardous chemical or select agent, and is developed to minimize the severity of damage to human health and the environment in the event of an unexpected hazardous materials release.

E. Training Records

UC's training records consisted of certificates for various employees at UC as well as for employees of Wilpen who regularly work with UC. These certificates are maintained onsite in a folder. Table 2 lists some of the certificates I reviewed, including the name of the person who received the certificate, the type of training indicated on the certificate, and the year the certificate was awarded.

Table 2. Training Records Review

Person Trained	Type of Training	Date of Certificate
Carrie Eder	Hazardous Materials Training	7/14/2004
Debra Robinson	Hazardous Waste Operations	7/10/2002
Debra Robinson	24-hr Hazardous Waste and Emergency Response Training	1/10/2001
Donald Samaan	8-hr Hazardous Materials	5/7/2003

	Technician Training	
Donald Samaan	24-hr Hazardous Waste and Emergency Response Training	1/10/2001
Donald Samaan	24-hr Hazardous Materials Basic Technician Training	6/16/1999
James Marsicek	8-hr Hazardous Materials Refresher Training	9/29/2003
Michael Wilk	8-hr OSHA Hazardous Communications	2/8/2004
Michael Wilk	8-hr Refresher Training for Hazardous Waste Sites	2/7/2004
Michael Wilk	8-hr Hazardous Waste Site Refresher Training OSHA 1910.120	2/27/2002
Michael Wilk	8-hr RCRA Training by Willpen	2/16/2002
Michael Wilk	8-hr Hazardous Waste Site Refresher Training OSHA 1910.120	2/19/2000
Michael Wilk	8-hr Hazardous Waste Site Training	2/22/1998
Michael Wilk	8-hr RCRA Training at Wilpen	2/21/1998

Table 2. Training Records Review (continued)

Person Trained	Type of Training	Date of Certificate
Michael Wilk	DOT HM-181 Hazardous Materials Training	2/15/1998
Michael Wilk	Hazardous Communication Training (OSHA)	2/14/1998
Pat McNeil	4-hr-HM-126F DOT Training	5/8/1998
Rebecca Bratt	8-hr Hazardous Materials	5/6/2003

	Refresher Training	
Rebecca Bratt	8-hr Hazardous Materials Refresher	5/29/2002
Rebecca Bratt	8-hr HAZWOPER Refresher Training	5/31/2001
Rebecca Bratt	8-hr HAZWOPER	3/27/2000
Ryan M. VanDeWoewstyne	Hazardous Materials Training	7/14/2004
Steven Beaudoin	Emergency Coordinator and Hazardous Waste Management Compliance Seminar	8/7/2003
Steven Beaudoin	Hazardous Materials Refresher	6/13/2003
Steven Beaudoin	RCRA Training Seminar	8/15/2002
Steven Beaudoin	Emergency Coordinator and Hazardous Waste Management Compliance Seminar	8/8/2002
Steven Beaudoin	8-hr Hazardous Materials Refresher Training	5/29/2002
Steven Beaudoin	8-hr HAZWOPER Training	5/31/2001
Steven Beaudoin	8-hr HAZWOPER Training	5/3/2000
Steven Beaudoin	4-hr-HM126F DOT Training	5/8/1998

Table 2. Training Records Review (continued)

Person Trained	Type of Training	Date of Certificate
Steven Beaudoin	Hazardous Waste and Emergency Response Training	3/13/1998
Steven Beaudoin	8-hr Hazardous Waste Site Operations Personnel Training	11/25/1996
Todd Herbig	8-hr OSHA Hazardous	2/8/2004

	Communications	
Todd Herbig	8-hr Refresher Training for Hazardous Waste Sites	2/7/2004
Todd Herbig	8-hr RCRA Training by Willpen	2/16/2002
Todd Herbig	Hazardous Waste Site Training	2/19/2000
Todd Herbig	Hazardous Waste Site Training Refresher	2/22/1998
Todd Herbig	8-hr RCRA Training by Wilpen	2/21/1998
Todd Herbig	8-hr DOT HM-181 Hazardous Materials Training	2/15/1998
Todd Herbig	Hazardous Communication Training	2/14/1998
Todd Herbig	8-hr Hazardous Waste Site Refresher Training OSHA 1910.120	2/27/2002
Todd Roeder	Hazardous Materials Refresher	8/15/2002
Walter P. McNeil	40-hr Hazardous Waste Site Operations Training Course	3/10/1995

As noted in Table 2, Mr. Beaudoin and Ms. Bratt have certificates indicating they have received various training related to hazardous waste management and emergency response, including HAZWOPER (Hazardous Waste Operations and Emergency Response). Mr. Beaudoin also appears to have received various RCRA specific training. Ms. Eder and Mr. VanDeWoestyne have received Hazardous Materials training in 2004. Information on emergency personnel positions, duties, and required training is included in the Emergency Response Plan for Hazardous Materials (Attachment G). Page 4 of the plan lists the following Emergency Response Team positions along with a description of their duties; On-Scene Incident Commander, Hazardous Materials Technician, Emergency Medical Team, and Site Safety Officer. In addition, the plan describes that one Hazardous Materials Technician will be chosen to serve as an Entry Team Leader during an emergency response. Page 6 of the plan lists the training

requirements (initial and annual) for the following positions; First Responder Awareness Level, On-Scene Incident Commander, and Hazardous Materials Technician. Attached to the beginning of the plan is a list of people who serve on the Hazardous Materials Response Team that includes office, pager, cell, and home phone numbers. Steven Beaudoin, Rebecca Bratt, Ryan VanDeWoestyne, and Carrie Eder are all listed as members on the team (page 2).

E. *Waste Analysis*

At the inspection I asked to see any waste analyses that UC had on file. Mr. Beaudoin had Wilpen Environmental Services fax me a copy of a waste analysis. The fax is included in Attachment H. It contains a Waste Receipt Worksheet, from Environmental Enterprises Inc., for a shipment of 280 gallons of solvent with the waste codes D001, D018, D022, D038, F002, F003, F005, and D036. It also includes an analytical report for a PCB test on oil.

VI. Closing Conference

At the conclusion of the inspection, I held a closing conference with Ms. Bratt. During the conference, I explained that I would need to review the information I collected during the inspection in conjunction with the state regulations to make a final determination of UC's compliance status. However, I did communicate certain discoveries that I did feel were of concern.

Specifically, I stated my concern over the fact that UC's contingency plan still contained the names of the old emergency coordinators. With respect to UC's contingency plan, I also explained that I would need to compare both plans (Attachments F and G) to determine UC's overall compliance with the contingency plan requirements. I also stated I was concerned with all of the undated and unlabeled bottles in the Laboratory Service Building.

I explained that I was concerned about all of the unlabeled and open containers of waste chemicals in the various laboratories I inspected. On this point, I explained that though I cannot be sure that every one of those bottles contained a RCRA hazardous waste, many of them likely did, especially organic solvents which probably have low flash points, acidic waste which may be corrosive, and certain specific waste like xylene, which is a listed hazardous waste. I explained that UC needs to determine what satellite areas contain hazardous waste and appropriately label and close them. We discussed that to be on the safe side, UC might want to treat all of these accumulation areas as hazardous waste satellite accumulation areas, until they determine otherwise. I also explained my concern over UC not having manifests on file for the year 2001. We discussed that they could probably get copies of these from their waste treatment facility. I also explained my concern over there not being a document that describes the hazardous waste training that

is given to employees including the name and title of each person with hazardous waste duties.

I asked Ms. Bratt if arrangements had been made with local authorities to familiarize them with the layout of the facility.

Ms. Bratt explained that the Fire Department, Police, and Chicago's 511-Haz Mat Squad have visited UC. I asked Ms. Bratt if the Emergency Response Plan for Hazardous Materials had been submitted to emergency responders like the police, fire department, and hospital. Ms. Bratt replied that she was not sure. I enquired about the timing of training for new employees to the Office of Safety and Environmental Affairs. Ms. Bratt explained that training is received in at least 6 months, and further explained that Ms. Eder, a new employee this year, received her training in one month (see table 2 for certification).

During the closing conference, Ms. Bratt asked if she could have a copy of the check list I was using. I explained that I would inquire about this back at the office. Finally, I asked Ms. Bratt if we could go back to the Laboratory Services Building, so I could confirm that all of the unlabeled waste bottles observed yesterday, had indeed been lab packed. Ms. Bratt agreed to take me there.

VII. Reinspection of the Laboratory Services Building

Ms. Bratt, Ms. Eder, and I returned to the Laboratory Services Building at approximately 11:00 A.M. All of the unlabeled and undated bottles observed on the previous day, were either gone, or had been lab packed. Photographs 21 - 24 are of the flammable, toxic, reactive, and corrosive storage rooms, and show that the unlabeled and undated bottles and containers featured in photographs 6-8 and 13-17, were either no longer present, or had been lab packed into labeled containers.

Attachments:

Attachment A:	UC Campus Map
Attachment B:	Laboratory Services Building Layout
Attachment C:	IEPA Memo
Attachment D:	UC Annual Report
Attachment E:	Photographs Taken During CEI
Attachment F:	Laboratory Service Building Contingency Plan
Attachment G:	UC's Emergency Response Plan for Hazardous Materials
Attachment H:	UC Waste Analyses
Attachment I:	IEPA LQG Inspection Checklist

Attachment A

UC Campus Map

Attachment B

Laboratory Services Building Layout

Attachment C

IEPA Memo

Attachment D

UC Annual Report

Attachment E

Photographs Taken During CEI

Attachment F

Laboratory Service Building Contingency Plan

Attachment G

UC's Emergency Response Plan for Hazardous Materials

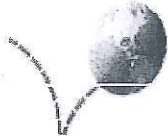
Attachment H

UC Waste Analyses

Attachment I

IEPA LQG Inspection Checklist

ILD 005421 136



University of Chicago - multiple ID Nos and addresses

Diane Sharrow to: Donna.Nicholson, Cora Helm, Sharon Travis
Cc: Spiros Bourgikos, Lorna Jereza, sbeaudoi, Kevin Chow
Bcc: Diane Sharrow

11/13/2009 04:58 PM

Cora, Sharon and Donna -

If you have any questions, please call or e-mail.

I have copied Spiros (IL State Contact for C&E), Lorna (CS 1 Section Chief), Kevin (ORC) and Steve Beaudoin at the University of Chicago on this message and the attached.

Thanks,



Illinois Handler Update Form - University of Chicago.doc



UofC ResptolnfoReq.pdf

Diane M. Sharrow
Environmental Scientist/Senior Inspector
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Illinois EPA Handler Generator Status Update Form

Record required RCRAInfo handler data fields for facilities determined by an inspection to have a change in generator status.

BOL ID # ILD005154778
10910 S. Langley Ave.
ILR000114512
5619 S. Cottage Grove
ILR000124008
5540 S. Hyde Park Ave.
ILR000124016
5445 Ingleside Ave.
ILR000124024
5454 S. Shore Dr.
ILR000129106
1027 E. 57th St.
ILR000146787
1369 E. Hyde Park Ave.
ILR000143750
Nursery School

General Correspondence

Date of Inspection: 8/24/9
10/5/9

Inspector Name: Diane Sharrow

EPA Identification Number: ILD005154778
10910 S. Langley Ave.
ILR000114512
5619 S. Cottage Grove
ILR000124008
5540 S. Hyde Park Ave.
ILR000124016
5445 Ingleside Ave.
ILR000124024
5454 S. Shore Dr.
ILR000129106
1027 E. 57th St.
ILR000146787
1369 E. Hyde Park Ave.
ILR000143750
Nursery School

Installation Name: University of Chicago & University of Chicago
Hospital

Location Street Address: See list above & attached PDF

Location City: Chicago Location State: Illinois

Location Zip Code: 60637

Location County: Cook

Current Generator Status: Not a generator (see attached PDF)

N – Not a Generator

1 – Large Quantity Generator

2 – Small Quantity Generator

3 – Conditionally Exempt SQG

Comments: The University of Chicago is using ID NO ILD005421136 on all manifests for all hazardous waste generated at the University and the University of Chicago Hospital. RCRA Info shows the address for ILD005421136 as 960 E. 58th St., Chicago, IL 60637. There is no bldg at this address – the less than 90 day storage facility is located at 6049 S. Blackstone Ave., Chicago, IL 60637.

The use of the ID NO ILD005421136 appears to be a carry over from the previous 90 day storage facility that was closed and demolished (?). Traditionally, ID Nos remain with a property location. However, the University of Chicago may have been told by the State of IL during closure activities, or the University of Chicago may have assumed that the continued use of this ID No for 6049 S. Blackstone Ave., was /is acceptable.

USEPA recommends that if the University of Chicago continues to use the ID NO ILD005421136 for 6049 S. Blackstone Ave., that the University of Chicago submit an Notification Form (EPA form 8700-12) to the State of IL – Illinois EPA to show the correct name (University of Chicago), correct mailing address of owner/operator and correct address of the less than 90 day storage facility.

E-mail form to Donna.Nicholson@illinois.gov

Note: Some generators may not be a Large Quantity Generator at the time of the inspection, but wish to retain the Large Quantity Generator status due to intermittent status as a Large Quantity Generator. If possible, the inspector should inform the handler of any intent to change their generator status.

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Have hazardous wastes been identified for purposes of compliance with Part 722? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? <i>Don't rely know</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>USED TO CHECK THERE PERMIT.</i>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? <i>DID NOT SEE EVIDENCE</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
	Section 722.121 Acquisition of Manifests Has the generator used:	
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? <i>IL manifest for facility in OHIO.</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	<p>- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?</p> <p>i.e for water shipments: 3 signed and dated copies to the designated facility or last water transporter if exported by water.</p> <p>for rail shipments 3 copies to next non-rail transporter (if any), designated facility if only by rail, or last rail transporter if exported by rail</p> <p>Yes _____ No _____ N/A <u>✓</u></p>	<p>722.123(c)</p> <p>722.123(d)</p>
	<p>SUBPART C: PRE-TRANSPORT REQUIREMENTS</p> <p>Is there any hazardous waste ready for transport off-site?</p> <p>Yes <u>✓</u> No _____ N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C?</p> <p>Yes <u>✓</u> No _____ N/A _____</p> <p>Section 722.134 Accumulation Time</p> <p>Has the generator complied with the following requirements:</p> <p>Yes _____ No _____ N/A _____</p> <p>(722.134(a)) A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? (See below and AA, BB, CC checklist)</p> <p><u>NOT ALL</u> Yes _____ No <u>✓</u> N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? (see below and AA, BB, CC checklist)</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A <u>✓</u></p> <p>(722.134(a)(2)) For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p><u>EXCEPT little bottles or small size bottles that were about</u> Yes <u>✓</u> No _____ N/A _____</p> <p>(722.134(a)(3)) For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? <u>EXCEPT smaller bottles</u></p> <p><u>about to be lab packed.</u> Yes <u>✓</u> No _____ N/A _____</p> <p>(722.134(a)(4)) Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? (see below and LDR checklist)</p> <p><u>mostly but not all</u> Yes _____ No <u>✓</u> N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers?</p> <p>Yes <u>✓</u> No _____ N/A _____</p> <p>If "No", go to Subpart J.</p> <p>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</p> <p>Has the generator closed an accumulation area?</p> <p>Yes <u>✓</u> No _____ N/A _____</p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p><u>according to</u> Yes <u>✓</u> No _____ N/A _____</p> <p><u>File 3 state.</u></p>	<p>722.130</p> <p>722.130</p> <p>to be lab packed ↓ also chloroform container's labels not visible</p>
5.211) (25.214)		725.211
		725.214

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? <i>55 gallon containers in</i> Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.273(b))	<i>LSB that were not all the way closed. (See report/notes)</i> Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input checked="" type="checkbox"/> No _____ N/A _____ Protected from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks, spontaneous ignitions, and radiant heat). No smoking signs must be posted conspicuously.	
(725.278)	Section 725.278 Air Emission Standards Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725 (see checklist)? <i>< 26 gal = exempt</i> Yes <input checked="" type="checkbox"/> No _____ N/A _____ <i>DOT, closed, sealed</i> Comments: <i>all organic wastes in accumulation areas had lids on them and were closed.</i> Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Note: If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS	
	Has the generator closed an accumulation area? Yes _____ No _____ N/A _____	725.211
(725.211) (725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A _____	725.214

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
25.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? <i>appears so</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? <i>Fire Department, Police Department</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? <i>Will Pen</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility? <i>Dr. Kohn at Hospital</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? <i>Don't know</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? <i>No Address</i> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? <i>Not all</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? <i>Emergency</i> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - location? <i>Equipment on list</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date? <i>Not all equipment listed</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <ul style="list-style-type: none"> a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: <ul style="list-style-type: none"> - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <ul style="list-style-type: none"> a) regulations are revised? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? <i>any above</i> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> d) information regarding emergency coordinators changes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? <i>Don't know of releases</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725?</p> <p>contractors mostly handle waste Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures?</p> <p>employees have emergency response training and some have haz waste training Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?</p> <p>mostly emergency response Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? emergency response plan indicates it does Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? not clear Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> key parameters for automatic waste feed cut-off systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> communications or alarm systems? not clear Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> response to fire or explosions? not clear Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> response to groundwater contamination incidents? not clear Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> shutdown of operations? not clear Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	training
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
25.116(c))	<p>Have facility personnel received an annual review of the initial training?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? job titles yes, name of each employee Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? except site safety officer Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	employee → no
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(728.107(a)(5))	<p>Section 728.107 Waste Analysis and Recordkeeping</p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the plan on-site?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
2.134(c)	<p>Section 722.134 Satellite Accumulation</p> <p>Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? <i>some satellite areas do not have description of contents and were open</i> Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? <i>appears so</i> Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? <i>[Signature]</i> Yes <input checked="" type="checkbox"/> No _____ N/A <input checked="" type="checkbox"/></p>	
722.134(g)	<p>Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p> <p>SUBPART D: RECORDKEEPING AND REPORTING</p>	
722.140(a)	<p>Section 722.140 Recordkeeping</p> <p>Has the generator retained for a period of 3 years: - a copy of each signed manifest? <i>manifests are not on file past 8/12/02</i> Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.140(d)
722.141(a)	<p>Section 722.141 Annual Reporting</p> <p>Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.</p>	722.141(a)
722.141(b)	<p>Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.141(b)
722.142(a)(1)	<p>Section 722.142 Exception Reporting</p> <p>If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
22.142(a)(2)	<p>If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.142(a)(1)
722.143	<p>Section 722.143 Additional Reporting</p> <p>Has the generator furnished additional reports as required by the Director?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.142(a)(2)
	<p>SUBPART E: EXPORTS OF HAZARDOUS WASTE</p>	722.143
722.150	<p>Is the generator an exporter of hazardous waste?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "Yes", has the generator complied with the requirements of Subpart E?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.150
	<p>SUBPART F: IMPORTS OF HAZARDOUS WASTE</p>	
722.160	<p>Is the generator an importer of hazardous waste?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "Yes", has the generator complied with the requirements of Subpart F?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.160
	<p>SUBPART G: FARMERS</p>	
722.170	<p>Is the generator a farmer?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "Yes", has the generator complied with the requirements of Subpart G?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>COMMENTS:</p>	722.170

TM:jab\722lqg.todd.wpd



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601

ROD R. BLAGOJEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

217/785-8604

Fax: 217/558-4905

December 1, 2003

Certified # 7002 2030 0001 1874 1880

University of Chicago
Laboratory Service Building
Attn: Dir. Safety & Env. Affairs
5555 S. Ellis Ave.
Chicago, IL 60637

Dear Director:

Enclosed please find the Annual Payment of Permit and Inspection Fees for a Hazardous Waste Management Facility Storing Hazardous Waste other than in a Surface Impoundment or Pile Report and Instructions. Due dates for submission of this report and payment are:

Date Due

Payment Due

March 1, 2004

\$500.00

If there are any questions, please contact me at 217/524-4337.

Sincerely,

Lynda Hotarek
Financial Mgmt. Unit
Planning and Reporting Section
Bureau of Land

Enclosures

PERMIT & INSPECTION FEE

Effective 1/1/04 Sec. 22.8 (415 ILCS 5/22.8) (From Ch. 111 1/2, par. 1022.8)

	Annual	Quarterly
Disposal - Off-site	\$70,000	\$17,500
Disposal - On-site	\$18,000	\$4,500
Disposal - Underground Injection	\$14,000	\$3,500
Treatment - Incineration	\$4,000	\$1,000
Treatment - Other than Inc.	\$2,000	\$500
Storing - Surface Impoundment or Pile	\$2,000	\$500
Storing - Other than Surface Impoundment or Pile	\$500 (Due March 1)	

All quarterly fees are due on the first day of each quarter - Jan, April, July and October

Manifests = \$3 effective 7/1/03

UNIVERSITY OF CHICAGO HOSPITAL
960 E 58TH ST
CHICAGO IL 60637

ILLINOIS Environmental Protection Agency

2003 Hazardous Waste Report

Form IC - Identification and Certification

Instructions for this form found on pages 12-15 This form must be completed for the location shown on the above label. If you need additional forms for other locations, call IEPA.

Section 1. HAZARDOUS WASTE ACTIVITIES

31 1 RCRA Generator Status as of 3-1-2004

32 Although site is no longer a LQG, it was an LQG during the calendar year of 2003.

1= LQG: Greater than 1,000 kg/mo (2200 lbs/mo) of non-acute hazardous waste

2= SQG: 100 to 1,000 kg/mo (220-2220 lbs/mo) of non-acute hazardous waste

3= CESGG: Less than 100 kg/mo of non-acute hazardous waste

4= Nongenerator

Other Generator Activities: Enter Y (yes) or N (no)

33 United States Importer of Hazardous Waste

34 X Mixed Waste (hazardous & radioactive) Generator

For Agency Use Only:

Fee enclosed: No Fee Enclosed

All other hazardous waste activities: Enter Y or N

35 N Transporter of Hazardous Waste

36 N Treater, Storer, or Disposer of Hazardous Waste (at your site).

Note: A hazardous waste permit is required for this activity.

37 N Recycler of Hazardous Waste (at your site)

Note: A hazardous waste permit may be required for this activity.

Exempt Boiler and/or Industrial Furnace:

38 N Small Quantity On-Site Burner Exemption

39 N Smelting, Melting, Refining Furnace Exemption

40 N Underground Injection Control

Section 2. UNIVERSAL WASTE ACTIVITIES:

N (Y or N) Large Quantity Handler (5000 kg) of Universal Waste.

Check types of universal waste generated and/or accumulated at your site.

Batteries 41 ☐ 42 ☐

Pesticides 43 ☐ 44 ☐

Thermostats 45 ☐ 46 ☐

Fluorescent Bulbs 47 ☐ 48 ☐

49 N (Y or N) Destination Facility for Universal Waste.

Note: A hazardous waste permit may be required for this activity.

Section 3. USED OIL ACTIVITIES: Enter Y or N

50 N Used Oil Transporter

51 N Used Oil Transfer Facility

52 N Used Oil Processor

53 N Used Oil Re-refiner

54 N Off-Specification Used Oil Burner

55 N Marketer who Directs Shipment of Off-Spec

Used oil to Off-spec Used Oil Burner

56 N Marketer Who First Claims the Used Oil Meets the Specifications

Section 4. ENTER THE NAICS CODE(S) FOR THIS LOCATION

57 62211 63 61131 69 75

Section 5. TYPES:

Site Land Type (Enter code from list in instructions): 81 1

Owner Type: (Enter code from list in instructions): 82 1

Date current owner Became Owner (mm/dd/yyyy): 83 1 1890

Operator Type: (Enter code from list in instructions): 91 1

Date current owner Became Operator (mm/dd/yyyy): 92 07 15 1991

Section 6. Comments: 100 Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

COST ESTIMATES FOR TSD FACILITIES, Interim status and permitted

A. Closure cost estimate: \$ 20 .000 .00

B. Estimate for post closure monitoring and maintenance costs (disposal facilities only): \$ 0 .0 .0 .0

Section 7. The Environmental Protection Agency is authorized to require this information under the Illinois Compiled Statutes (>ILCS), 1994 as amended, Chapter 415 ILCS 5/4 and 21. Disclosure of this information is required. Failure to disclose this information may result in civil and criminal penalties pursuant to 415 ILCS 5/42 and 44. This form has been approved by the Forms Management Center.

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Please print: Last Name Beaudoin First Name Steven B. Title Director Safety & Environmental Affairs

C. Signature [Signature] D. Date of Signature 2/13/04

Name, Telephone number, and FAX number of person to contact if there are questions about this report.

Michael Wink - Wilpen Environmental 773-736-4076

UNIVERSITY OF CHICAGO HOSPITAL
950 E 58TH ST
CHICAGO IL 60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: HALOGENATED SOLVENTS
B. EPA Hazardous Waste Code: D 001 F 002 F 003 F 005 D 018
C. Source Code: G 22 Management Method: H
D. Form code: W 204

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 0.9 lb/gal (Same unit and density must be used for all quantities on this page).
B. Quantity Generated in Current reporting year: 4680.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.
N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: _____
On-Site System 2: Management Method H Quantity managed on-site this year: _____

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 HD 08 33 77 01 0
C. Management method shipped to: H 141
D. Total quantity shipped in this reporting year: 440.0

SITE 2. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 HD 08 33 77 01 0
C. Management method shipped to: H 040
D. Total quantity shipped in this reporting year: 110.0

SITE 3. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 HD 08 33 77 01 0
C. Management method shipped to: H 061
D. Total quantity shipped in this reporting year: 4020.0

SITE 4. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 HD 08 33 77 01 0
C. Management method shipped to: H 129
D. Total quantity shipped in this reporting year: 110.0

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____
C. Management method shipped to: H
D. Total quantity shipped in this reporting year: _____

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
960 E 58TH ST
CHICAGO IL 60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: SCINTILLATION VIALS - XYLENE AND TOLUENE

B. EPA Hazardous Waste Code: D001 F003 F005

C. Source Code: G22 Management Method: H

D. Form code: W203

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 09.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 184.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 83

On-Site System 2: Management Method H Quantity managed on-site this year: 97

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H129

D. Total quantity shipped in this reporting year: 16

SITE 2. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 104.0

SITE 3. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H061

D. Total quantity shipped in this reporting year: 64.0

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
560 E 58TH ST
CHICAGO 60631

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LAB PACK

B. EPA Hazardous Waste Code: L A B P

C. Source Code: G 22 Management Method: H

D. Form code: W 001

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 12.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 2159.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 83

On-Site System 2: Management Method H Quantity managed on-site this year: 97

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 H D 0 8 3 3 7 7 0 1 0

C. Management method shipped to: H 0 4 0

D. Total quantity shipped in this reporting year: 359.0

SITE 2. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 H D 0 8 3 3 7 7 0 1 0

C. Management method shipped to: H 0 6 1

D. Total quantity shipped in this reporting year: 1337.0

SITE 3. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 H D 0 8 3 3 7 7 0 1 0

C. Management method shipped to: H 0 7 1

D. Total quantity shipped in this reporting year: 132.0

SITE 4. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 H D 0 8 3 3 7 7 0 1 0

C. Management method shipped to: H 0 7 5

D. Total quantity shipped in this reporting year: 21.0

SITE 5. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 H D 0 8 3 3 7 7 0 1 0

C. Management method shipped to: H 1 2 1

D. Total quantity shipped in this reporting year: 310.0

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
960 E 58TH ST
CHICAGO IL 60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LAB PACK

B. EPA Hazardous Waste Code: LABP

C. Source Code: G22 Management Method: H

D. Form code: W001

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density: 12.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 4484.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year:

On-Site System 2: Management Method H Quantity managed on-site this year:

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H129

D. Total quantity shipped in this reporting year: 402.0

SITE 2. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 4484.0

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
960 E 58TH ST
CHICAGO IL 60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: SODIUM HYPOCHLORITE

B. EPA Hazardous Waste Code: D002

C. Source Code: G22 Management Method: H

D. Form code: W113

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 12.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 90.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: _____

On-Site System 2: Management Method H Quantity managed on-site this year: _____

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H071

D. Total quantity shipped in this reporting year: 60.0

SITE 2. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 60.0

SITE 3. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H075

D. Total quantity shipped in this reporting year: 90.0

SITE 4. Name and address of off-site facility: _____

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 5. Name and address of off-site facility: _____

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
960 E 58TH ST
CHICAGO

IL
60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: MERCURY

B. EPA Hazardous Waste Code: D009

C. Source Code: G 32 Management Method: H

D. Form code: W 117

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 20.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 100.5

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: _____

On-Site System 2: Management Method H Quantity managed on-site this year: _____

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 100.5

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

COMMENTS: _____ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
560 E 58TH ST
CHICAGO IL 60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LEAD ACID BATTERIES

B. EPA Hazardous Waste Code: D002 D008

C. Source Code: G16 Management Method: H

D. Form code: W309

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 20.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 1413.6

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: _____

On-Site System 2: Management Method H Quantity managed on-site this year: _____

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 1413.6

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

COMMENTS: _____ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
960 E 58TH ST
CHICAGO IL 60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LIGHT BULBS- FLUORESCENT

B. EPA Hazardous Waste Code: D009

C. Source Code: G19 Management Method: H

D. Form code: W319

SECTION 2. QUANTITY GENERATED

A. UOM: 2 Density 05.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 3.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: _____

On-Site System 2: Management Method H Quantity managed on-site this year: _____

SECTION 4. OFF- SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 3.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

COMMENTS: _____ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
560 E 58TH ST
CHICAGO

60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: GAS CYLINDERS-ORGANIC

B. EPA Hazardous Waste Code: L A B P

C. Source Code: G 1 1 Management Method: H

D. Form code: W 801

SECTION 2. QUANTITY GENERATED

A. UOM: 3 Density 0 1 0 0 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 132.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: _____

On-Site System 2: Management Method H Quantity managed on-site this year: _____

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H 1 4 1

D. Total quantity shipped in this reporting year: 132.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

COMMENTS: _____ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
560 E 58TH ST
CHICAGO

60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: GAS CYLINDERS - INORGANIC

B. EPA Hazardous Waste Code: L A B P

C. Source Code: G 11 Management Method: H

D. Form code: W 801
If source code = G25

SECTION 2. QUANTITY GENERATED

A. UOM: 3 Density 0.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 3.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

Y Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 3.0

On-Site System 2: Management Method H Quantity managed on-site this year: 3.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H 141

D. Total quantity shipped in this reporting year: 3.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 134

C. Management method shipped to: H 146

D. Total quantity shipped in this reporting year: 150

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 160

C. Management method shipped to: H 172

D. Total quantity shipped in this reporting year: 178

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 186

C. Management method shipped to: H 188

D. Total quantity shipped in this reporting year: 202

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 212

C. Management method shipped to: H 224

D. Total quantity shipped in this reporting year: 228

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

UNIVERSITY OF CHICAGO HOSPITAL
960 E 58TH ST
CHICAGO IL 60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: NICKEL CADMIUM BATTERIES

B. EPA Hazardous Waste Code: D 006

C. Source Code: G 16 Management Method: H
If source code = G25

D. Form code: W 309

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 20.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 65.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 83

On-Site System 2: Management Method H Quantity managed on-site this year: 97

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H 141

D. Total quantity shipped in this reporting year: 65.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 134

C. Management method shipped to: H 146

D. Total quantity shipped in this reporting year: 150

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 180

C. Management method shipped to: H 172

D. Total quantity shipped in this reporting year: 178

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 186

C. Management method shipped to: H 188

D. Total quantity shipped in this reporting year: 202

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 272

C. Management method shipped to: H 224

D. Total quantity shipped in this reporting year: 228

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LAB PACK P-LISTED

B. EPA Hazardous Waste Code: LABP

C. Source Code: G22 Management Method: H
If source code = G25

D. Form code: W004

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 2.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 7.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 83

On-Site System 2: Management Method H Quantity managed on-site this year: 97

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 042083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 7.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 134

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 150

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 180

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 176

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 186

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 202

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 212

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 228

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LEAD

B. EPA Hazardous Waste Code: D008

C. Source Code: G22 Management Method: H

D. Form code: W 307
If source code = G25

SECTION 2. QUANTITY GENERATED

A. UOM: l Density 30.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 55.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 83

On-Site System 2: Management Method H Quantity managed on-site this year: 97

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 55.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 134

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 150

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 180

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 176

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 186

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 202

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 212

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 228

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LITHIUM BATTERIES

B. EPA Hazardous Waste Code: D 0 0 3

C. Source Code: G 1 6 Management Method: H
If source code = G25

D. Form code: W 3 0 9

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 0 8 0 0 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 6.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: _____

On-Site System 2: Management Method H Quantity managed on-site this year: _____

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H 1 4 1

D. Total quantity shipped in this reporting year: 6.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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CHICAGO

60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: MERCURIC CHLORIDE SOLUTION

B. EPA Hazardous Waste Code: D009

C. Source Code: G22 Management Method: H

D. Form code: W113

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 08.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 25.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year:

On-Site System 2: Management Method H Quantity managed on-site this year:

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 042083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 25.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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ILLINOIS Environmental Protection Agency
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Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: SILVER SOLUTION

B. EPA Hazardous Waste Code: D 011

C. Source Code: G 08 Management Method: H
If source code = G25

D. Form code: W 113

SECTION 2. QUANTITY GENERATED

A. UOM: (Density 08.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 385.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 83

On-Site System 2: Management Method H Quantity managed on-site this year: 97

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H040

D. Total quantity shipped in this reporting year: 120.0

SITE 2. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H071

D. Total quantity shipped in this reporting year: 30.0

SITE 3. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H121

D. Total quantity shipped in this reporting year: 115.0

SITE 4. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 120.0

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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260 E 58TH ST
CHICAGO

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: SULFURIC ACID

B. EPA Hazardous Waste Code: D002

C. Source Code: G19 Management Method: H
If source code = G28 54

D. Form code: W103

SECTION 2. QUANTITY GENERATED

A. UOM: l Density: 0.00 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 170.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: _____

On-Site System 2: Management Method H Quantity managed on-site this year: _____

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: OH D083377010

C. Management method shipped to: H111

D. Total quantity shipped in this reporting year: 170.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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CHICAGO IL 60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: SODIUM HYDROXIDE SOLUTION

B. EPA Hazardous Waste Code: D002

C. Source Code: G19 Management Method: H
If source code = G25

D. Form code: W 110

SECTION 2. QUANTITY GENERATED

A. UOM: L Density 1.0 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 140.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 83

On-Site System 2: Management Method H Quantity managed on-site this year: 97

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H111

D. Total quantity shipped in this reporting year: 140.0

SITE 2. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H121

D. Total quantity shipped in this reporting year: 15.0

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 180

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 176

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 185

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 202

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 212

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 228

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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560 E 58TH ST
CHICAGO IL 60637

ILLINOIS Environmental Protection Agency
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Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: HYDROXY PROPHONOACETIC ACID

B. EPA Hazardous Waste Code: D 0 0 2

C. Source Code: G 1 9 Management Method: H
If source code = G28 54

D. Form code: W 2 1 9

SECTION 2. QUANTITY GENERATED

A. UOM: l Density 1 0 . 0 0 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 6 0 . 0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 8 3

On-Site System 2: Management Method H Quantity managed on-site this year: 0 7

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.

4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 0 H D 0 8 3 3 7 7 0 1 0

C. Management method shipped to: H 1 4 1

D. Total quantity shipped in this reporting year: 6 0 . 0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 1 3 4

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 1 5 0

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 1 8 0

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 1 7 6

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 1 8 6

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 2 0 2

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: 2 1 2

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: 2 2 4

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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560 E 58TH ST
CHICAGO

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: SODIUM BISULFATE SOLUTION

B. EPA Hazardous Waste Code: D002

C. Source Code: G19 Management Method: H
If source code = G23

D. Form code: W110

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 1.0 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 110.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: _____

On-Site System 2: Management Method H Quantity managed on-site this year: _____

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H121

D. Total quantity shipped in this reporting year: 110.0

SITE 2. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to: _____

C. Management method shipped to: H

D. Total quantity shipped in this reporting year: _____

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

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560 E 58TH ST
CHICAGO

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 16-21.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: HYDROCHLORIC ACID

B. EPA Hazardous Waste Code: D002

C. Source Code: G19 Management Method: H

D. Form code: W103

SECTION 2. QUANTITY GENERATED

A. UOM: l Density 1.0 lb/gal (Same unit and density must be used for all quantities on this page).

B. Quantity Generated in Current reporting year: 85.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? DO NOT include RCRA exempt processes.

N Y = Yes (continue to system 1) N = No (skip to section 4.)

On-Site System 1: Management Method H Quantity managed on-site this year: 83

On-Site System 2: Management Method H Quantity managed on-site this year: 97

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No

SITE 1. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 30.0

SITE 2. Name and address of off-site facility: ENVIRONMENTAL ENTERPRISES, INC.
4650 SPRING GROVE
CINCINNATI, OHIO 45232

B. U.S. EPA ID No. of facility waste was shipped to: 04D083377010

C. Management method shipped to: H111

D. Total quantity shipped in this reporting year: 55.0

SITE 3. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

SITE 4. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

SITE 5. Name and address of off-site facility:

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to: H

D. Total quantity shipped in this reporting year:

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

Page 23

For Form GM-Generation Management, Section 4 - Management method H129 and H141, this designation requires additional information:

The other applicable management codes for this are H061, H075, H121 and H141.

ILD 005 421 136 031 64100 01
UNIVERSITY OF CHICAGO HOSPITAL
960 E 58TH ST
CHICAGO IL
P 60637

ILLINOIS Environmental Protection Agency
2003 Hazardous Waste Report
Form TI - Transporter Identification

Instructions for this form found on page 21. **PLEASE NOTE** that the four-digit hauling permit number is no longer valid for hazardous waste transporters, the transporter **must** have a Uniform Program Permit Number.

1. U.S. EPA ID No. 0H0000000539³¹ Hauling Permit No. UP.W0333081-0H¹²⁷

Transporter Name, Address, and Telephone Number: 800-545-1823
MIDWEST ENVIRONMENTAL TRANSPORT, INC.
10163 CINCINNATI-DAYTON ROAD
CINCINNATI, OHIO 45241

2. U.S. EPA ID No. _____⁴³ Hauling Permit No. _____¹³⁹

Transporter Name, Address, and Telephone Number: _____

3. U.S. EPA ID No. _____⁵⁵ Hauling Permit No. _____¹⁵¹

Transporter Name, Address, and Telephone Number: _____

4. U.S. EPA ID No. _____⁶⁷ Hauling Permit No. _____¹⁶³

Transporter Name, Address, and Telephone Number: _____

5. U.S. EPA ID No. _____⁷⁹ Hauling Permit No. _____¹⁷⁵

Transporter Name, Address, and Telephone Number: _____

6. U.S. EPA ID No. _____⁹¹ Hauling Permit No. _____¹⁸⁷

Transporter Name, Address, and Telephone Number: _____

7. U.S. EPA ID No. _____¹⁰³ Hauling Permit No. _____¹⁹⁹

Transporter Name, Address, and Telephone Number: _____

8. U.S. EPA ID No. _____¹¹⁵ Hauling Permit No. _____²¹¹

Transporter Name, Address, and Telephone Number: _____

COMMENTS: _____ Enter Y(Yes) if you have comments regarding this page; attach extra sheet. Page 24
223 13

22
28

#31

FedEx USA Airbill
Express

FedEx
Tracking
Number

8427 3302 0880

1 From Please print and press hard.
Date 2/13/04 Sender's FedEx Account Number 1373-5352-0
Sender's Name Rebecca Bratt Phone (773) 702-9999
Company UDC/SAFETY OFFICE/U121731
Address 5555 S ELLIS AVE FL 2 Dept./Floor/Suite/Room
City CHICAGO State IL ZIP 60637-1401

2 Your Internal Billing Reference
First 24 characters will appear on invoice.

3 To
Recipient's Name _____ Phone () _____
Company ILLINOIS ENVIRONMENTAL Protection Agency
Address BUREAU OF LAND #24
To "HOLD" at FedEx location, print FedEx address. We cannot deliver to P.O. boxes or P.O. ZIP codes.
Address 1021 NORTH GRAND AVE. E.
City Springfield State ILL ZIP 62702-3998

0215 Sender's Copy

4a Express Package Service
☐ FedEx Priority Overnight
Next business morning
☒ FedEx Standard Overnight
Next business afternoon
☐ FedEx First Overnight
Earliest next business morning
delivery to select locations

☐ FedEx 2Day
Second business day
FedEx Envelope rate not available. Minimum charge: One-pound rate.
☐ FedEx Express Saver
Third business day

4b Express Freight Service
☐ FedEx 1Day Freight*
Next business day
☐ FedEx 2Day Freight
Second business day
☐ FedEx 30day Freight
Third business day

* Call for Confirmation.
Packaging
☒ FedEx Envelope*
☐ FedEx Pak*
Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak
☐ Other

6 Special Handling
☐ SATURDAY Delivery
Available ONLY for FedEx Priority Overnight and FedEx 2Day to select ZIP codes.
☐ HOLD Weekday at FedEx Location
Available for FedEx First Overnight.
☐ HOLD Saturday at FedEx Location
Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.
Does this shipment contain dangerous goods?
☐ No ☐ Yes
As per attached Shipper's Declaration
☐ Yes
Shipper's Declaration not required
Dry Ice
Dry Ice, 6, UN 1845
kg
Dangerous Goods (including Dry Ice) cannot be shipped in FedEx packaging.
☐ Cargo Aircraft Only

7 Payment Bill to:
☒ Sender
Account No. in Section 1 will be billed.
☐ Recipient
☐ Third Party
☐ Credit Card
☐ Cash/Check

FedEx Acct. No. _____ Exp. Date _____
Credit Card No. _____
Total Packages _____ Total Weight _____ Total Declared Value†
\$ _____ .00

†Our liability is limited to \$100 unless you declare a higher value. See back for details.
FedEx Use Only

8 Release Signature Sign to authorize delivery without obtaining signature

By signing you authorize us to deliver this shipment without obtaining a signature and agree to indemnify and hold us harmless from any resulting claims

447

By using this Airbill you agree to the service conditions on the back of this Airbill and in our current Service Guide, including terms that limit our liability.

Questions? Visit our Web site at fedex.com
or call 1.800.Go.FedEx® 800.463.3339.

0257239921

Attachment G: UC's Emergency Response Plan for Hazardous Materials
Attachment H: UC Waste Analyses
Attachment I: IEPA LQG Inspection Checklist

Attachment E

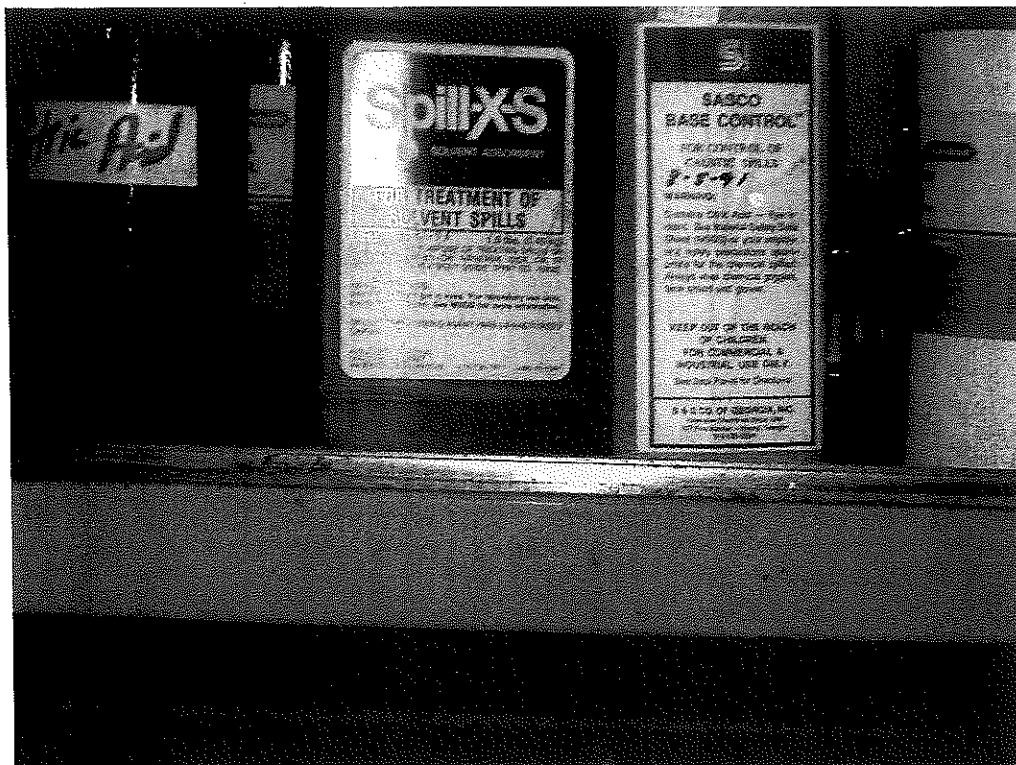
Photographs Taken During CEI



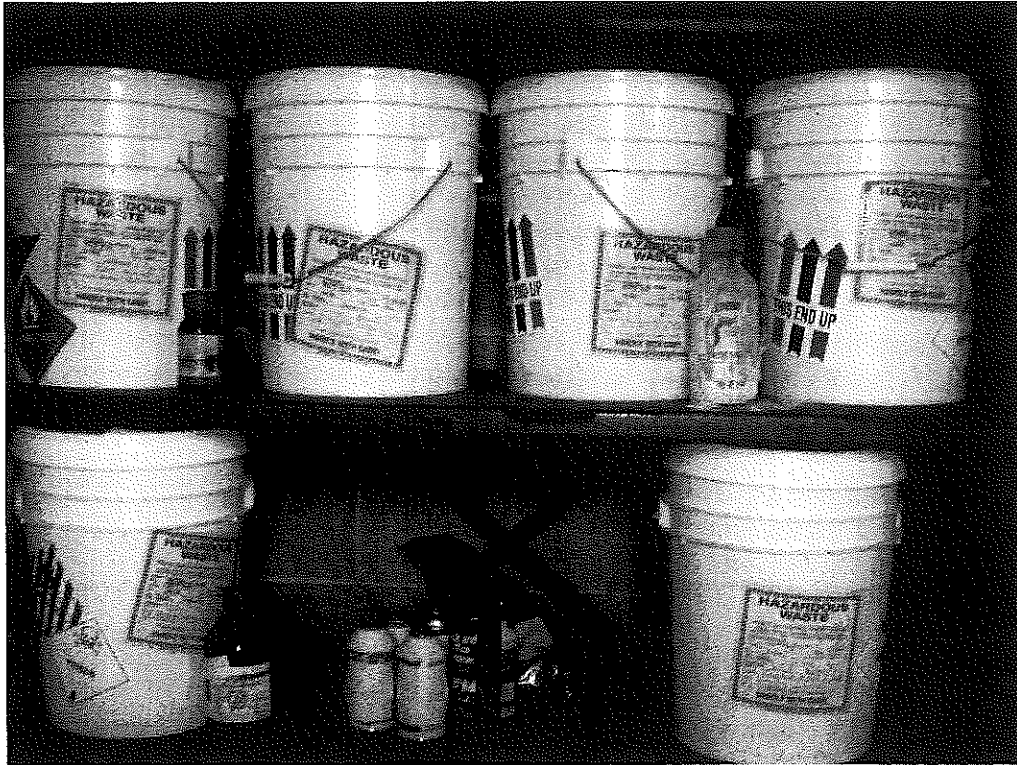
Photograph 1. Spill control equipment in a cabinet at the Laboratory Services Building. The cabinet was located in the room labeled “Laboratory” on Attachment B. The photograph was taken on August 26, 2004.



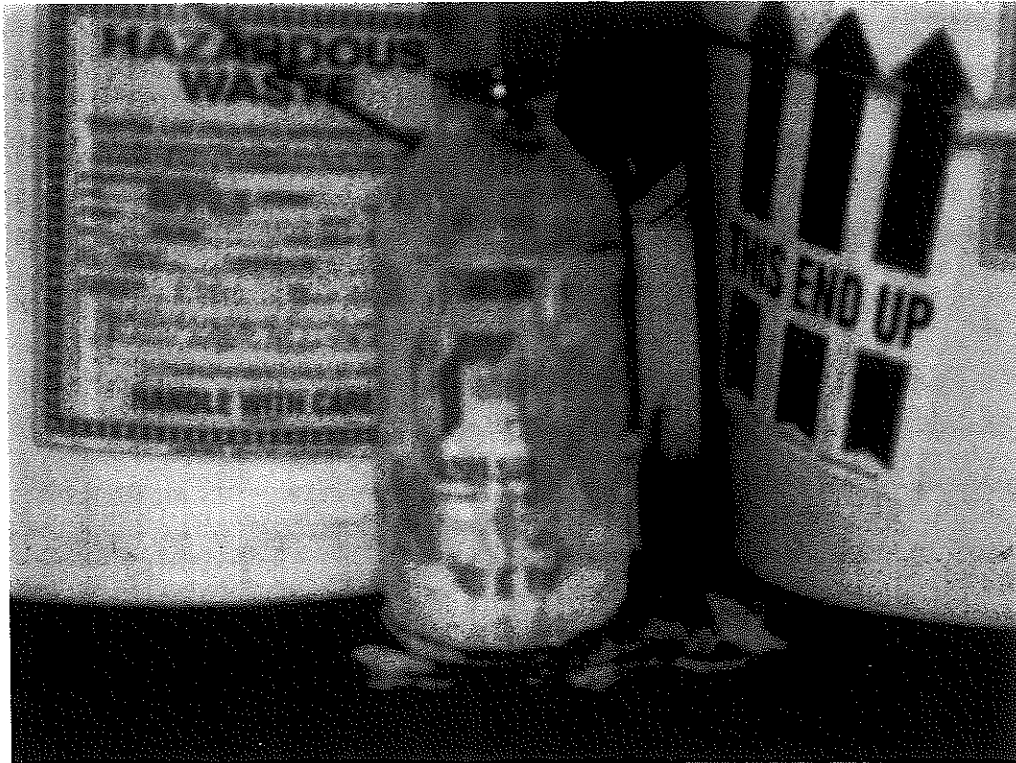
Photograph 2. Spill control equipment in a cabinet at the Laboratory Services Building. The cabinet was located in the room labeled "Laboratory" on Attachment B. The photograph was taken on August 26, 2004.



Photograph 3. Spill control equipment in a cabinet at the Laboratory Services Building. The cabinet was located in the room labeled "Laboratory" on Attachment B. The photograph was taken on August 26, 2004.



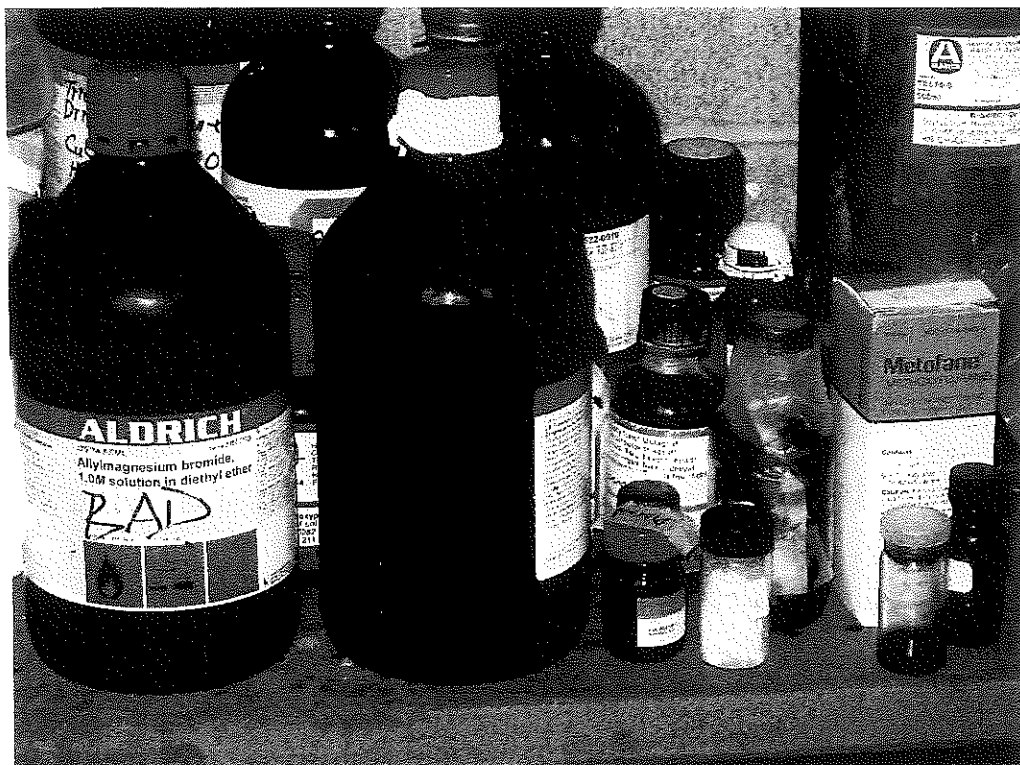
Photograph 4. 5-gallon buckets of hazardous waste on a shelf in the Flammable Storage room at the Laboratory Services Building. Also featured in the photograph are small bottles of waste chemicals that are not labeled with the words, "Hazardous Waste," or with accumulation start dates. The photograph was taken on August 26, 2004.



Photograph 5. Close up of bottle featured on the top shelf in photograph 4. Note pinkish colored material coating the exterior of the bottle. A UC representative believed the bottle contained nitric acid that was involved in a spill. The photograph was taken on August 26, 2004.



Photograph 6. Shelving unit in Flammable Storage Room of the Laboratory Services Building. Bottles on shelves are not labeled with the words, "Hazardous Waste," or with accumulation dates. Among the bottles present, were ones labeled allyl magnesium bromide (marked BAD), cuy cumin, 5-ammonium sulfide, potassium methyl borrohydride, triethyl amine DT, 1-isoproyl amines, and 4-nitrobenzoalcohol. The photograph was taken on August 26, 2004.



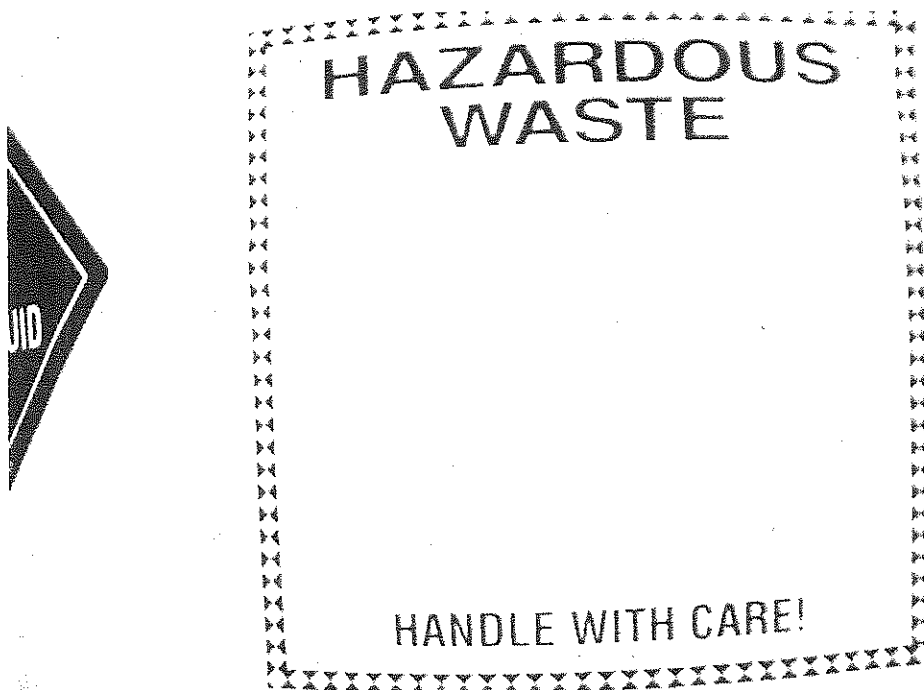
Photograph 7. Close up of some of the chemicals on the bottom shelf of the shelving unit featured in photograph 6. Note lack of accumulation dates and "Hazardous Waste" labels. The photograph was taken on August 26, 2004.



Photograph 8. Waste chemicals on top shelf of shelving unit featured in photograph 6. Note lack of accumulation dates and "Hazardous Waste" labels on the bottles. The photograph was taken on August 26, 2004.



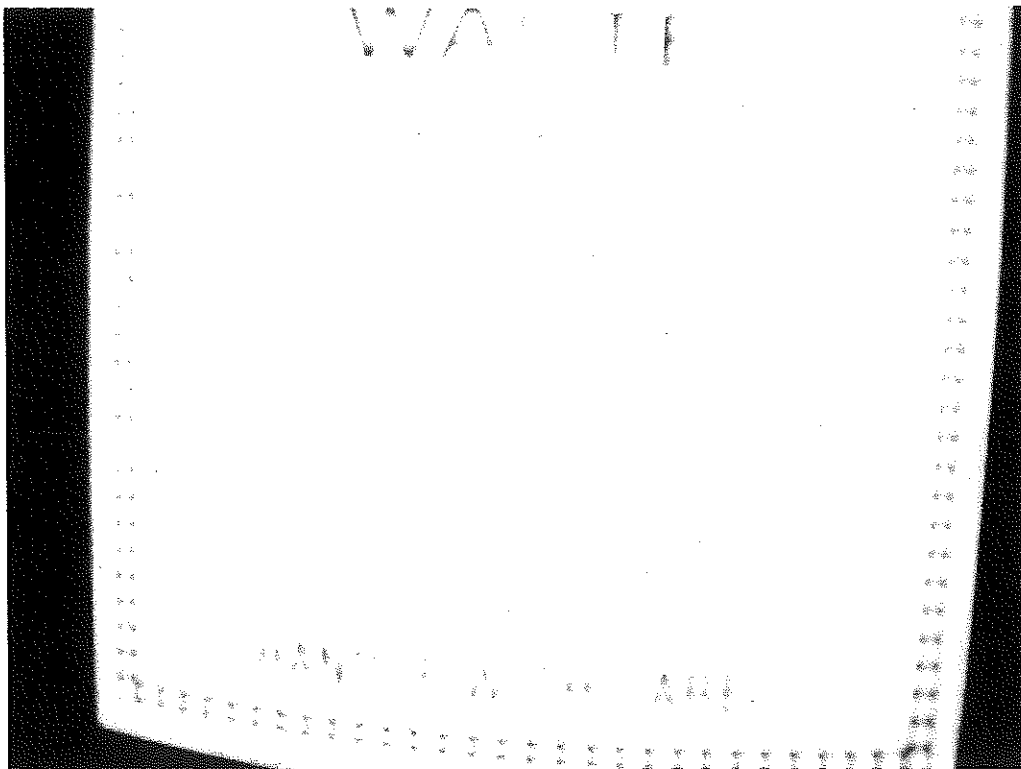
Photograph 9. Two 55-gallon containers of xylene hazardous waste (right) and xylene/benzene hazardous waste (left) located in the Flammable Storage Room at the Laboratory Services Building. The photograph was taken on August 26, 2004.



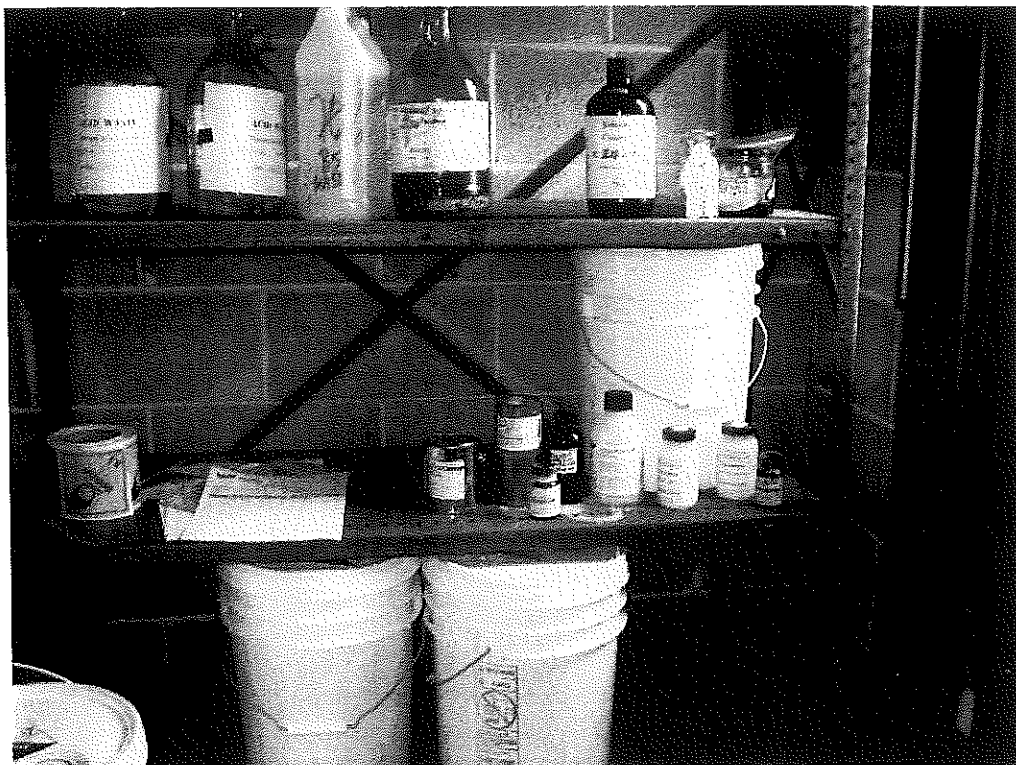
Photograph 10. Hazardous waste label on xylene/benzene hazardous waste container featured on the left of photograph 9. The photograph was taken on August 26, 2004.



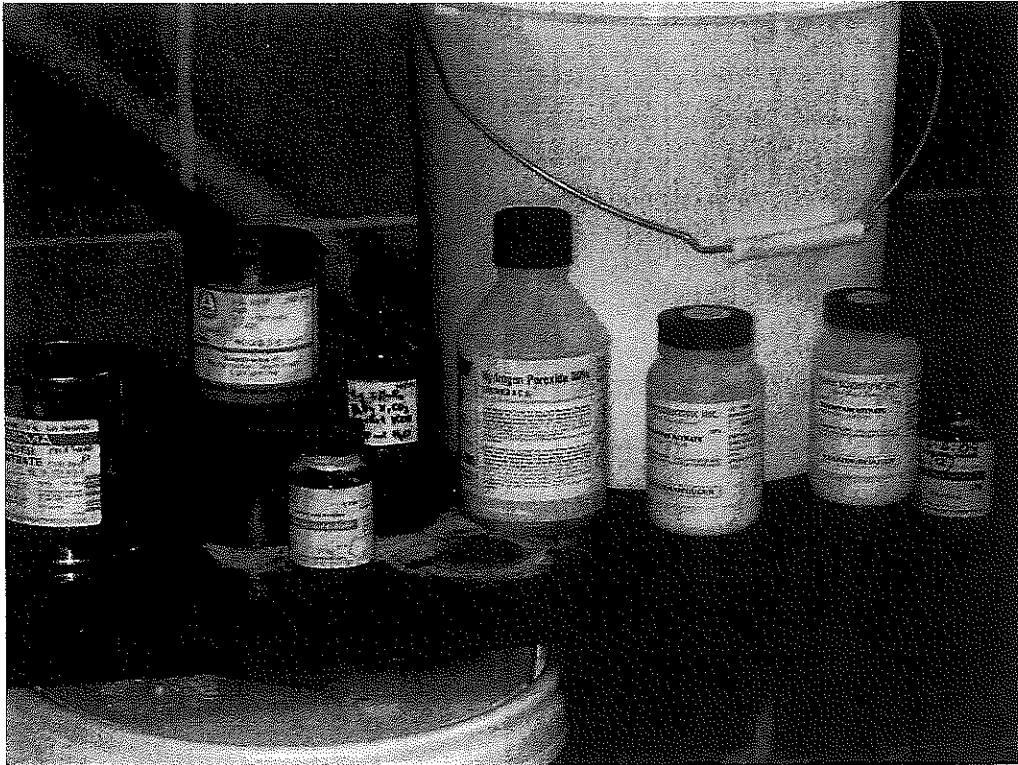
Photograph 11. 55-gallon container of lab-packed hazardous waste in the Flammable Storage Room at the Laboratory Services Building. Note the unsecured lid on the container. The photograph was taken on August 26, 2004.



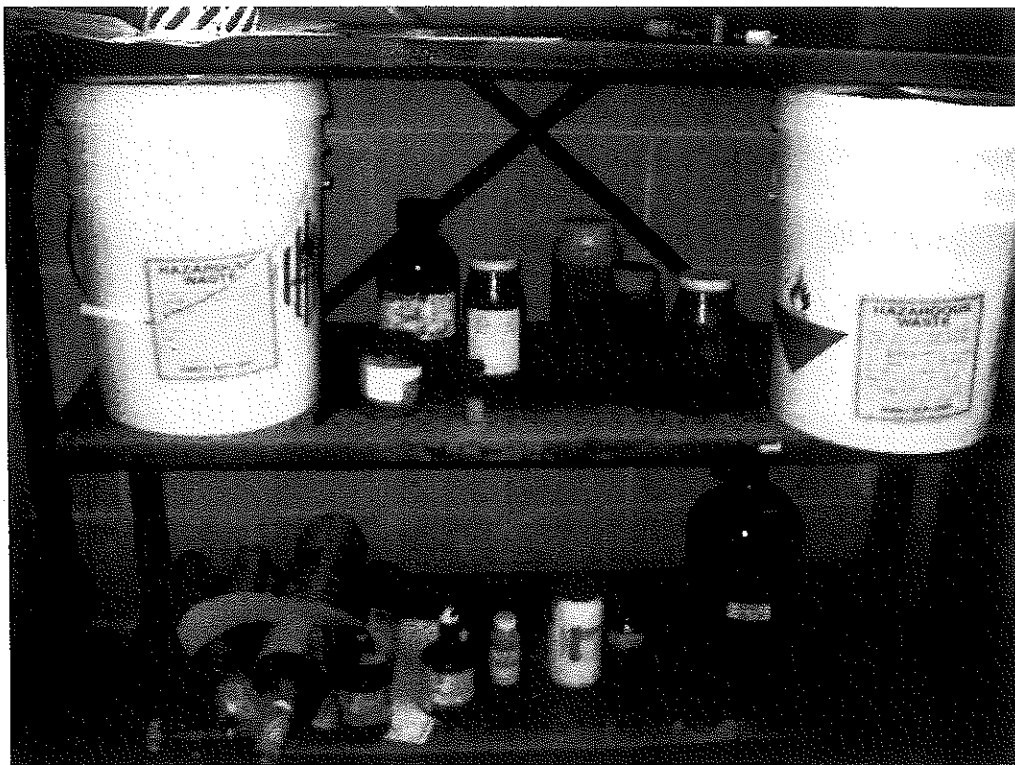
Photograph 12. Hazardous waste label on 55-gallon container featured in photograph 11. The photograph was taken on August 26, 2004.



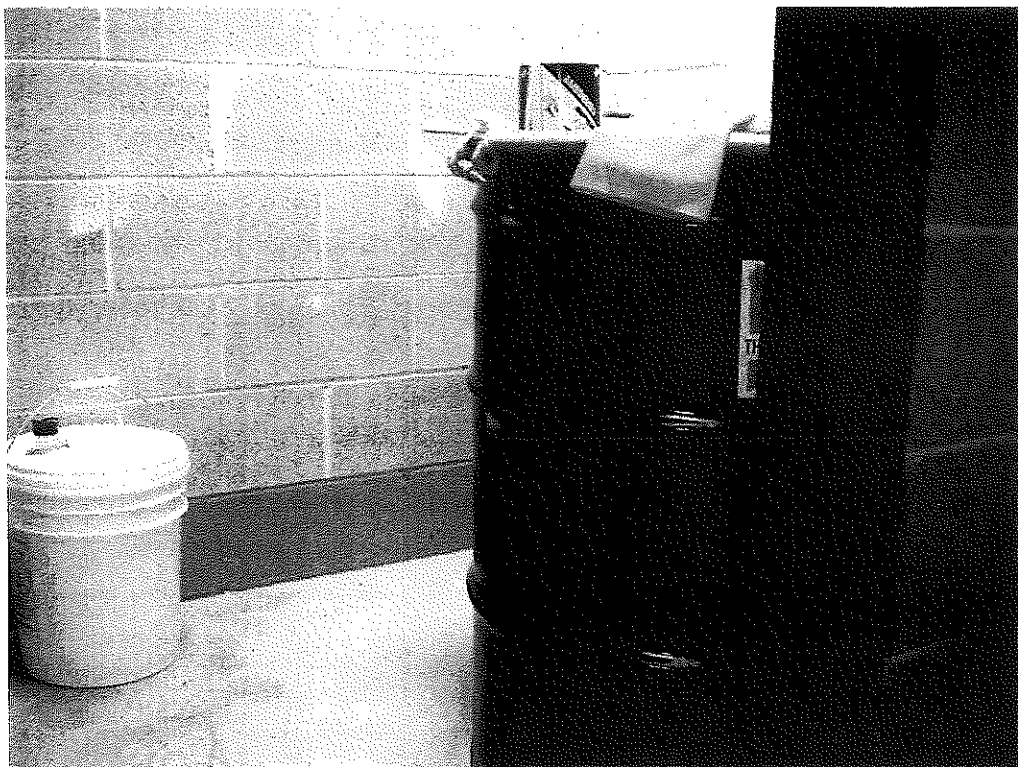
Photograph 13. Shelving unit located in the Toxic Storage Room of the Laboratory Services Building. The top shelf contains two 4-liter bottles of mercury and nitric acid waste; one 4-liter bottle containing mercury, acetone and sulfur waste; and a smaller, amber colored bottle labeled “silver.” None of these bottles are labeled with the words, “Hazardous Waste,” or accumulation dates. The middle shelf contains an assortment even smaller bottles and containers that are also not labeled with the words, “Hazardous Waste,” or accumulation dates. Among them were bottles and containers labeled silver nitrate, silver(II)oxide, hydrogen peroxide, strontium nitrate, and sodium meta periodate. The photograph was taken on August 26, 2004.



Photograph 14. Assortment of waste chemicals featured on middle shelf of shelving unit in photograph 13. None of the bottles or containers are labeled with the words, "Hazardous Waste," or accumulation dates. Among the chemicals present were bottles and containers labeled silver nitrate, silver(II)oxide, hydrogen peroxide, and strontium nitrate. The photograph was taken on August 26, 2004.



Photograph 15. Assortment of small bottles and jars in the Reactive Storage Room at the Laboratory Services Building. None of the bottles or jars are labeled with the words, "Hazardous Waste," or with accumulation dates. Among them, were bottles or jars labeled NaCN, 3M sodium thiosyoane, sodium thiocyanate, and RNA STAT GO. Also featured in the photograph are two 5-gallon buckets D001-D003 hazardous waste. The photograph was taken on August 26, 2004.



Photograph 16. Corrosive Storage Room at the Laboratory Services Building. The 55-gallon container on the right contained sodium hydroxid and was labeled, "Hazardous Waste," with the waste code D002. The 5-gallon bucket on the left contained sulfuric acid, (indicated by its marking of H_2SO_4). The bucket was not labeled with the words, "Hazardous Waste," or with an accumulation start date. The photograph was taken on August 26, 2004.



Photograph 17. 5-gallon bucket (right) and 4-liter bottle (left) of sulfuric acid in the Corrosives Storage Room at the Laboratory Services Building. The 5-gallon bucket is also featured in photograph 16. Both were labeled, " H_2SO_4 ." Neither the bucket nor the bottle were labeled with the words, "Hazardous Waste," or with accumulation dates. The photograph was taken on August 26, 2004.



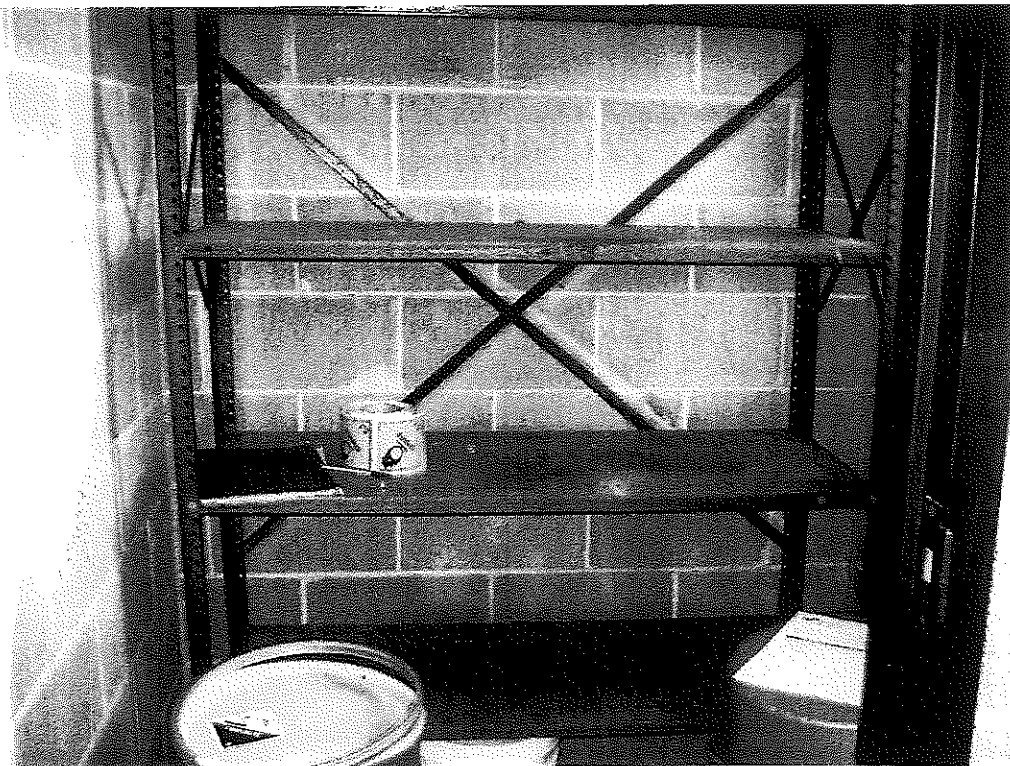
Photograph 18. Staging Room in the Laboratory Services Building. Brown container with yellow hazardous waste labels contained chloroform (D022). 55-gallon containers did not contain hazardous waste. The photograph was taken on August 26, 2004.



Photograph 19. Staging Room in the Laboratory Services Building. Photograph shows storage of hazardous and non-hazardous wastes in containers. The photograph was taken on August 26, 2004.



Photograph 20. Empty shelving unit in the Flammable Storage Room at the Laboratory Services Building, as photographed on August 27, 2004. The same shelving unit is featured in photographs 6-8, which were taken on August 26, 2004. The assortment of bottles and containers featured in photograph 6, are no longer present.



Photograph 21. Empty shelving unit in Toxic Storage Room at the Laboratory Services Building, as photographed on August 27, 2004. The same shelving unit is featured in photographs 13-14, which were taken on August 26, 2004. Note that the small containers and bottles in photographs 13-14 are no longer present.



Photograph 22. Shelving unit in the Reactive Storage Room at the Laboratory Services, as photographed on August 27, 2004. The same shelving unit is featured in photograph 15, which was taken on August 26, 2004. Note that the assortment of small bottles and containers in photograph 15 are no longer present.



Photograph 23. Corrosive Storage Room at the Laboratory Services Building as photographed on August 27, 2004. The Corrosive Storage Room is also featured in photographs 16 and 17, which were taken on August 26, 2004. The 4-liter bottle present in photograph 17, was no longer present when this photograph was taken. Also, the unlabeled and undated bucket present in photographs 16 and 17 is now labeled and dated.

Attachment I

IEPA LQG Inspection Checklist

Attachment F

Laboratory Service Building Contingency Plan



UNIVERSITY OF CHICAGO
SAFETY AND ENVIRONMENTAL AFFAIRS

FACSIMILE TRANSMITTAL SHEET

TO: Anna VanOrden

FROM: Rebecca Bratt

COMPANY:

DATE: 11-4-02

FAX NUMBER: 847-294-4083

NUMBER OF PAGES TO FOLLOW: 1

☐ URGENT ☒ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Anna,

Attached is the revised contact information
for the contingency plan. Call if you have questions.

Thank you.
Rebecca Bratt

5555 SOUTH ELLIS AVENUE

CHICAGO, ILLINOIS 60637
PHONE(773)702-9999 FAX(773)702-6546

Contingency Plan

Facility Name: Laboratory Services Building
Location: 6041 South Blackstone Avenue
Operator: The University of Chicago

1. General Information

Laboratory Service Building is a receiving point for waste chemicals from research and teaching laboratories of the University of Chicago. Chemicals are received at the facility, sorted and segregated, and stored until a disposal contractor comes on-site to lab pack them. Chemicals are normally received in original containers; usually glass or plastic bottles ranging in size from a few ounces to approximately one gallon. Flammable chemicals may be consolidated into 55-gallon drums for ease of storage and disposal.

The building is a one-story masonry structure without attachment to any other building. It is remotely located on the far southeast side of the university campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue (See Figure 1 and Figure 2).

The building occupies an area of 31 ft. by 38 ft. with finished concrete floor. To the east side of the building there is a fenced yard with a concrete patio. Inside the building it is subdivided into several areas (rooms), including a laboratory, to store chemicals of the same compatibility (Flammable, Reactive, Toxic, and Corrosive) and each room is labeled as such. The floor plan and designation of each area is shown in Figure 3.

2. Emergency Coordinators

Primary Coordinator: Mr. Steven Beaudoin
5555 South Ellis Avenue
Chicago, Illinois 60637
Office Phone: 773-702-9999
Home Phone: 708-672-6975

Alternate Coordinator: Ms. Rebecca Bratt
5555 South Ellis Avenue
Chicago, Illinois 60637
Office Phone: 773-702-9999
Home Phone: 773-205-8225

CONTINGENCY PLAN

Facility Name- Laboratory Service Building
Location- 6041 South Blackstone Avenue
Operator- The University of Chicago

1. General Information

Laboratory Service Building is a receiving point for waste chemicals from research and teaching laboratories of the University of Chicago. Chemicals are received at the facility, sorted and segregated, and stored until a disposal contractor comes on-site to lab pack them. Chemicals are normally received in original containers; usually glass or plastic bottles ranging in size from a few ounces to approximately one gallon. Flammable chemicals may be consolidated into 55-gallon drums for ease of storage and disposal.

The building is a one-story masonry structure without attachment to any other buildings. It is remotely located on the far southeast side of the university campus. The direct access route by vehicles to the building is from East 61st Street or Dorchester Avenue, then to Blackstone Avenue (See Figure 1 and Figure 2).

The building occupies an area of 31 ft. by 38 ft. with finished concrete floor. To the east side of the building there is a fenced yard with a concrete patio. Inside the building it is subdivided into several areas (rooms), including a laboratory, to store chemicals of the same compatibility (Flammable, Reactive, Toxic, and Corrosive) and each room is labeled as such. The floor plan and designation of each area is shown in Figure 3.

2. Emergency Coordinators

Primary Coordinator: Dr. Sam Wang
6041 Blackstone Avenue or
5747 S. Ellis Avenue
The University of Chicago
Chicago, Illinois
Office Phone: 753-0829 or 702-7051
Home Phone: 429-9129

Alternate Coordinator: Dr. Roy Mackal
Young Building, Room 307
The University of Chicago
Chicago, Illinois
Office Phone: 702-3416
Home Phone: 238-6516

Duties of Emergency Coordinators:

- 1) Respond to an emergency call or notification.
- 2) Identify and assess the emergency situation and take immediate action, if appropriate.
- 3) Notify emergency response teams, including city Fire Department, Police Department, and medical facilities, etc..
- 4) Work closely with emergency response teams.
- 5) Take post-emergency measures to prevent reoccurrence of the incident.

3. Notification

When fire, explosion, or any unexpected release occurs, the facility operator or personnel should immediately:

- 1) Notify other personnel in the building by voice. The facility is small enough that a voice amplification system is not required.
- 2) Notify emergency coordinator(s) listed on page 1.
- 3) Notify Campus Security (Campus Police Department) by dialing 123 from a campus phone or 702-8181 from a non-campus phone.
- 4) Notify city Fire Department (same phone numbers as Campus Security).

4. Control Procedures

- 1) City Fire Department will respond immediately to any fire, explosion or release of hazardous materials. The Fire Department will contain and control any fire involved at the facility with the assistance of the emergency coordinator. Spill releases will be controlled through use of absorbent material such as vermiculite and spill control pillows.
- 2) Spill material with the absorbent will be picked up and placed in appropriate storage containers for disposal through The University of Chicago's normal waste disposal contractor. The facility operator will remove all waste from the spill area for ease of clean-up. The facility will not accept new waste until the spill or leak has been cleaned up and controlled.
- 3) All equipment and containers will be decontaminated or replaced prior to resuming normal operation in the Laboratory Service Building following conclusion of emergency response and clean-up procedures.

5. Emergency Equipment

An emergency shower and eyewash are located by the doorway leading from the office/chemical sorting area to the storerooms.

Two Class ABC fire extinguishers are located in the office/chemical sorting room and one Class D fire extinguisher is

located in the hallway between the storage rooms. The facility is equipped with a smoke detector system that alarms directly at the Campus Security Office.

Half-face and full-face respirators suitable for organic vapor and acid gases are located in the office/chemical sorting room. The facility operator also has respirators located in his office.

Lab coats, face shields, and rubber gloves are located in the chemical sorting area.

6. Evacuation Plan

Evacuation of the facility will be initiated by voice signal to personnel inside. Evacuation from the area will be made by Dorchester Avenue north to Midway Plaisance. Alternate evacuation route would be to go south on Dorchester Avenue.

7. Coordination Agreement Arrangements

The University of Chicago maintains its own campus security (Campus Police Department) and medical facility (The University of Chicago Medical Center). Arrangements have been made with the following response teams in case of an emergency. Copies of this Contingency Plan were sent to each agency.

- 1) Campus Security
5555 South Ellis Avenue
Phone: 702-8190
- 2) The University of Chicago
Medical Center
Emergency Care
5815 Maryland Avenue
Phone: 702-6250
- 3) City Fire Department
Engine No. 60
1150 East 55th Street
Phone: 288-2636
- 4) City Fire Department
Engine No. 63
1405 East 62nd Place
Phone: 493-0833

8. Required Reports

A follow-up report detailing the incident, emergency response, clean-up, and actions taken to prevent reoccurrence will be

prepared and submitted to the Illinois Environmental Protection Agency within 15 days of occurrence. All records concerning the incident and report will be maintained by the facility operator until three years after final closure of the Laboratory Service Building.

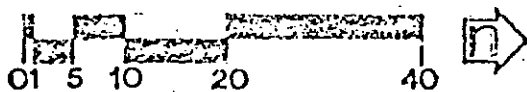
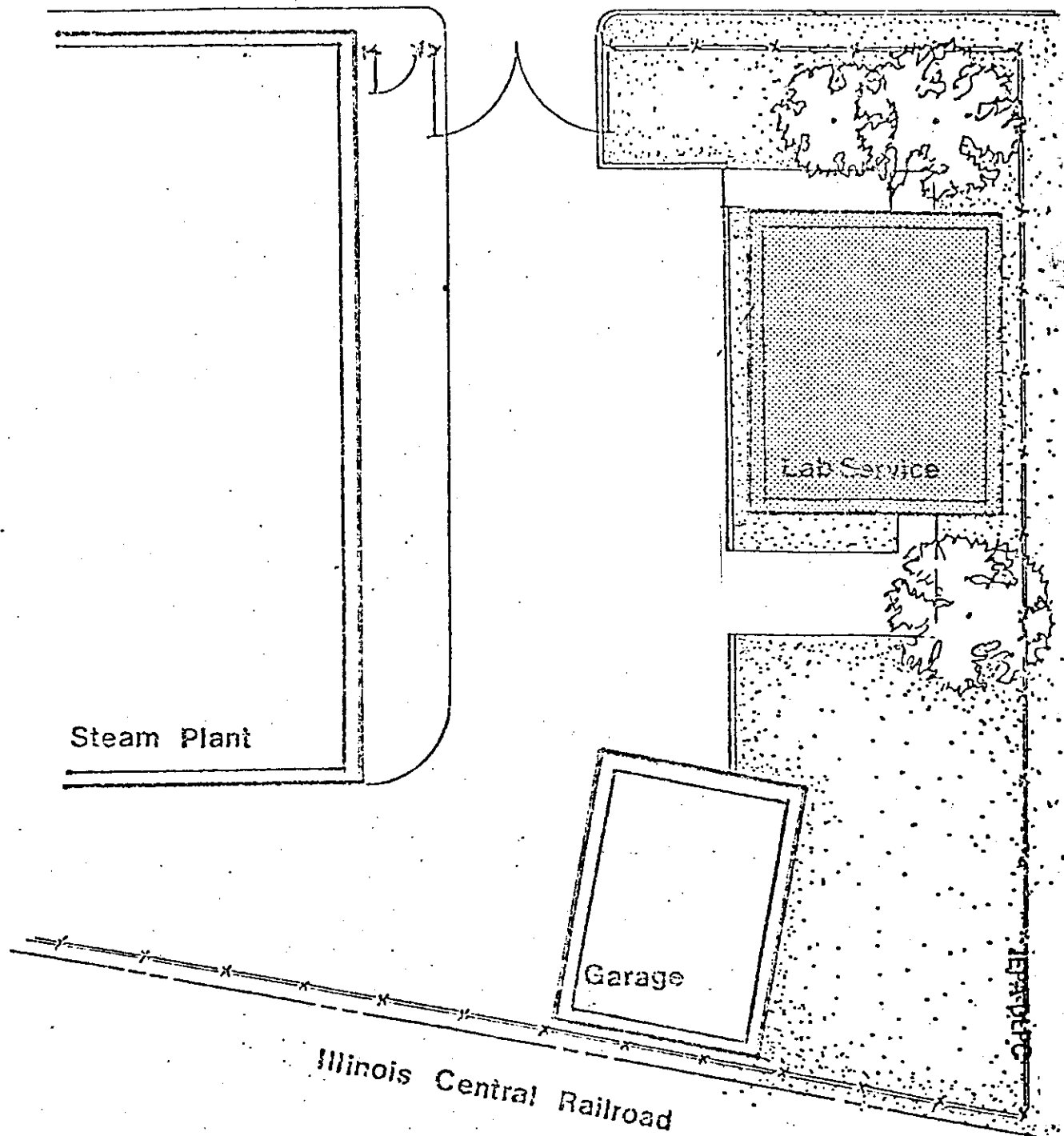
Revised May 10, 1989

This is a detailed street map of the University City area in Philadelphia. The map shows a grid of streets with various buildings and landmarks. Key streets include Cottages Grove Ave. at the top, Drexel Ave., Ellis Av., University Av., Woodlawn Av., Kimbark Av., Kenwood Av., Dorchester Av., and Blackstone Av. at the bottom. The map also shows a compass rose pointing North, a scale bar, and a legend for various symbols like buildings, parking lots, and transit lines. The map is oriented with North at the top.

Laboratory Service Building

Fig. 2 Laboratory Service Building

S. Blackstone Ave.



Laboratory Service Building

THE UNIVERSITY OF CHICAGO
OFFICE OF THE ASSISTANT VICE-PRESIDENT
PHYSICAL PLANNING

THE UNIVERSITY OF CHICAGO

CHICAGO • ILLINOIS 60637

DEPARTMENT OF CHEMISTRY

5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY • GEORGE HERBERT JONES LABORATORY

SEARLE CHEMISTRY LABORATORY

May 15, 1989

Clinical Manager
Emergency Care Unit
The University of Chicago
Medical Center
5815 Maryland Avenue
Chicago, Illinois 60637

Dear Sir:

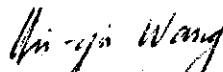
This is part of our effort to implement our Contingency Plan for the Laboratory Service Building, owned and operated by The University of Chicago. The Laboratory Service Building, located at 6041 South Blackstone Avenue, is a receiving point for waste chemicals from university campus.

To prepare for any unexpected event, it is imperative that we make arrangements with all the emergency response teams in the neighborhood to handle the situation. A copy of our Contingency Plan is enclosed with this letter which will give detailed information about our facility.

As one of our response teams, we have included your address and phone number in the plan in case of emergency medical care. Please let me know if you should have any questions. I will call you a few days from now to confirm the arrangement.

Your attention and full support to this matter are greatly appreciated.

Sincerely yours,



Sam H. Wang
Laboratory Safety Officer
The University of Chicago

THE UNIVERSITY OF CHICAGO

CHICAGO • ILLINOIS 60637

DEPARTMENT OF CHEMISTRY

5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY • GEORGE HERBERT JONES LABORATORY

SEARLE CHEMISTRY LABORATORY

May 15, 1989

Administrative Director
Campus Security
5555 South Ellis Avenue
Chicago, Illinois 60637

Dear Sir:

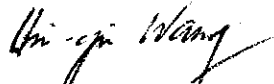
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As one of our response teams, we have included your address and phone number in the plan in case of an emergency. Please let me know if you should have any questions. I will call you a few days from now to confirm the arrangement.

Your attention and full support to this matter are greatly appreciated.

Sincerely yours,



Sam H. Wang
Laboratory Safety Officer
The University of Chicago

THE UNIVERSITY OF CHICAGO

CHICAGO • ILLINOIS 60637

DEPARTMENT OF CHEMISTRY

5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY • GEORGE HERBERT JONES LABORATORY

SEARLE CHEMISTRY LABORATORY

May 15, 1989

Fire Chief
City Fire Department,
Engine No.60
1150 East 55th Street
Chicago, Illinois 60615

Dear Sir:

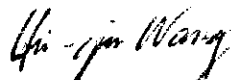
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To prepare for any unexpected event, it is imperative that we make arrangements with all the emergency response teams in the neighborhood to handle the situation. A copy of our Contingency Plan is enclosed with this letter which will give detailed information about our facility.

As one of our response teams, we have included your address and phone number in the plan in case of a fire emergency. Please let me know if you should have any questions. I will call you a few days from now to confirm the arrangement.

Your attention and full support to this matter are greatly appreciated.

Sincerely yours,



Sam H. Wang
Laboratory Safety Officer
The University of Chicago

THE UNIVERSITY OF CHICAGO

CHICAGO • ILLINOIS 60637

DEPARTMENT OF CHEMISTRY

5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY • GEORGE HERBERT JONES LABORATORY

SEARLE CHEMISTRY LABORATORY

May 15, 1989

Fire Chief
City Fire Department,
Engine No.63
1405 East 62nd Place
chicago, Illinois 60637

Dear Sir:

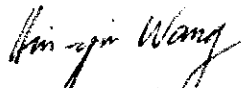
This is part of our effort to implement our Contingency Plan for the Laboratory Service Building, owned and operated by The University of Chicago. The Laboratory Service Building, located at 6041 South Blackstone Avenue, is a receiving point for waste chemicals from university campus.

To prepare for any unexpected event, it is imperative that we make arrangements with all the emergency response teams in the neighborhood to handle the situation. A copy of our Contingency Plan is enclosed with this letter which will give detailed information about our facility.

As one of our response teams, we have included your address and phone number in the plan in case of a fire emergency. Please let me know if you should have any questions. I will call you a few days from now to confirm the arrangement.

Your attention and full support to this matter are greatly appreciated.

Sincerely yours,



Sam H. Wang
Laboratory Safety Officer
The University of Chicago

Attachment G

UC's Emergency Response Plan for Hazardous Materials



The University Of Chicago
 .Risk Management, Audit and Safety.
 Safety and Environmental Affairs
 5555 South Ellis, Chicago, Illinois 60637

Hazardous Materials Response Team - Emergency Telephone List

<i>Name</i>	<i>Office #</i>	<i>Pager #</i>	<i>Cell Phone #</i>	<i>Home #</i>
<u>Safety Office</u>				
Steve Beaudoin	773-834-1131	773-652-1464	773-320-9478	708-672-6975
Krista Cooley	773-834-1133	773-652-1472	773-320-6737	219-462-8592
Rebecca Bratt	773-702-5663	773-652-1445	773-320-2569	773-205-8225
John Bivona	773-834-1130	773-652-1461	773-612-0444	708-339-8617
Tom Wicinski	773-702-0711	773-652-1456	773-320-8500	815-609-8614
See added list for new employees				
<u>Radiation Safety Office</u>				
James Marsicek	773-834-8876	773-753-1880 ID#8062	NA	219-797-1229
Matthew Rumick	773-834-9771	773-753-1880 ID#9131	NA	815-439-0727
Donald Samaan	773-834-9122	773-753-1880 ID#8063	NA	312-493-4057
Bjorn Torling	773-834-9733	773-834-1955 ID#9132	NA	630-372-7548
John Gratzle	773-834-9720	773-834-1955 ID#9134	NA	773-493-0749

Internal Contacts

<i>Name</i>	<i>Department</i>	<i>Office #</i>	<i>Emergency #</i>
Hank Webber	Vice-President: University News & Comm. Affairs	773-702-3627	773-288-0938
Glenn Klinksiek	Director of Risk Management	773-702-3693	Pager: 773-834-1955 ID#9897 Home: 773-643-4513
Candace Walters	Risk Management Analyst	773-702-1951	Pager: 773-834-1955 ID#4649 Home: 773-528-7043
Bob Griffith	Associate Vice President: Facilities Services	773-834-3529	Home: 708-957-0800 Cell: 773-401-0147 Wife's Cell: 708-790-0304
U of C General Information			773-702-1234
U of C Hospital Main Number			773-702-1000
Facilities Services			773-702-2111 (5-3800)
Hospital "On-Call" Safety Officer			773-753-1880 ID#8382
University "On-Call" Safety Officer			Pager: 773-652-0043
Radiation Safety "On-Call"			Pager: 773-753-1880 ID#9130

2004 "On-Call" Schedule



The University Of Chicago
 .Risk Management, Audit and Safety.
 Safety and Environmental Affairs
 5555 South Ellis, Chicago, Illinois 60637

Name	Office Phone Number	Pager Number	Cell Phone Number	Home Phone Number
Steven Beaudoin	773-834-1131	773-652-1464 195 ID# 4803	773-320-9478	708-672-6975
Krista Cooley	773-834-1133	773-652-1472 195 ID# 4805	773-320-6737	219-462-8592
Rebecca Bratt	773-702-5663	773-652-1445 195 ID# 4804	773-320-2569	773-205-8225
John Bivona	773-834-1130	773-652-1461 195 ID# 4807	773-612-0444	708-339-8617
Ryan VanDeWoestyne	773-702-0711	773-652-1456 195 ID# 4806	773-320-8500	309-945-6896
Carrie Eder	773-834-9815	773-652-0004 195 ID#4923	773-612-2500	708-606-1417
"On-Call" Duty Officer	-	773-652-0043 195 ID# 5000	-	-
Hospital Duty Pager	-	773-753-1880 195 ID# 8382	-	-

Month on Duty	Staff Member on Duty
January 1 st – 11 th 2004	Krista Cooley
January 12 th – 18 th 2004	Rebecca Bratt
January 19 th – 25 th 2004	Tom Wiencek
January 25 th – 31 st 2004	John Bivona
February 2004	Rebecca Bratt
March 2004	Tom Wiencek
April 2004	John Bivona
May 2004	Krista Cooley
June 2004	Rebecca Bratt
July 1 st – 9 th 2004	Rebecca Bratt
July 10 th – 22 nd 2004	John Bivona
July 23 rd – 31 st 2004	Krista Cooley
August 2004	John Bivona
September 2004	Krista Cooley
October 2004	Rebecca Bratt
November 2004	Ryan VanDeWoestyne
December 2004	Carrie Eder

Emergency Spill Response Cart Items

Item	Quantity
Absorbent Mini Booms	2
Absorbent Pillows	2
Acid Absorbent	2
Aprons	2
Baking Soda	2 pounds
Base Absorbent	2
Bleach	1 gallon
Broom	1
Caution "Chemical Spill" Banner	1
Chemical Boots (2-Lg or 2-XLg)	4 pair
Chemical Resistant Gloves	3 pair
Chemical Spill Sign	1
Chemical Splash Goggles	3
Counter Dust Broom	1
Duct Tape	1
Dust Pan	1
Emulsifier	1 gallon
Flashlight (Large) Check Battery	1
Flashlight (Small) Check Battery	1
Formaldehyde Neutralizer	2
Garbage Bags	5
5-Gallon Buckets with Lids	2
General Absorbent	1 Bag
Notebook/Paper/Pen	1
Organic Solvent Absorbent Sponges	2
pH Paper	1
Plug N' Dike	1
Push Broom	1
Scrub Brush	1
Shovel with Handle	1
Silver Shield Gloves	3 pair
Solvent Absorbent	2
Squeegee	1
Stop Watch	1
Surgical Gloves	4 pair
Tool Set (Non-Sparking)	1
Water Bottle	1

big fans
Tip 100 x 100'

2



<i>Name</i>	<i>Non-Emergency #</i>
Aldrich Chemical Company, Incorporated	414-273-3850
American Petroleum Institute	202-682-8000
American Red Cross National Headquarters	202-737-8300
Asbestos <u>Abatement Contractors:</u> ACI: Main Number: 847-228-0550 Emergency: Dan Kuksa's Cell Phone Holian: Jim Holian Universal: Pat Connelly <u>Asbestos Consultant:</u> United Analytical Services: Main Number: 630-691-8271 Emergency: Kevin Aikman's Pager	847-774-6707 815-675-6683 815-372-5044 630-816-9441
BMS/CAL (Blackmon-Mooring-Steamatic Catastrophe, Inc.)	800-433-2940
BOC Gases	630-971-1119
BSC Gases (Pensylvania)	800-232-4726
Bureau of Explosives/AAR	719-585-1881
Cancer Information Services	800-422-6237
Centers for Disease Control (CDC)	404-639-3535
Chemical Manufacturer Association (CMA)	202-887-1100
Chemical Transportation Emergency Center (CHEMTREC) 24-Hour	800-424-9300
CHEMTREC Center (Non-Emergency Chemical Information Services)	800-262-8200
CHEM-TEL (24-Hour Emergency Information Services)	813-979-4620
City of Chicago Police Department Bomb Squad	312-744-6273
City of Chicago Building Department	312-744-5000
City of Chicago Disaster Services	312-744-4752/0225
City of Chicago Fire Department	911
City of Chicago Police Department	911
City of Chicago Environment Control	312-744-4075
City of Chicago Streets and Sanitation	312-744-5000
City of Chicago Water and Sewer Department	312-744-7038
Clean Harbors (Midwest Region)	773-646-6202
Compressed Gas Association	703-412-0900
Department of Transportation (DOT)	202-366-4488
Department of Energy (DOE)	708-252-2001
Department of Health and Human Services (DHHS)	312-353-5160
Dow Chemical	800-258-2436
Dupont Chemical	800-441-7515
Emergency Planning Community Right-to Know Hotline CERCLA (SARA, Title III) 8:30 a.m. – 7:30 p.m. ET	800-535-0202
Emission Control Technology Center	919-541-0800
Environmental Protection Agency (EPA) Hotline	800-621-8431
EPA RCRA, Superfund, Hazardous Waste Hotline Office of Solid Waste and Emergency Response 8:30 a.m. – 7:30 p.m. ET	800-424-9346
Environmental Safety Group Incorporated	800-242-4295
Emergency Services and Disaster Agency (ESDA)	800-782-7860
Federal Aviation Administration – Great Lakes Headquarters	847-294-7428 After Hours: 847-294-7401

Federal Bureau of Investigation (FBI) – Chicago	312-431-1333
Federal Emergency Management Agency (FEMA)	202-646-4600
Fluka Chemical Corporation	414-273-3850
Food and Drug Administration (FDA)	301-443-1544
Illinois Emergency Management	800-782-7860
Indoor Air Quality Information Center	800-438-4318
Inspector General's Whistleblower Hotline (Environmental Only)	800-424-4000
Keer-McGee Chemical	405-270-1313
Martin Boyer Company, Incorporated	312-782-4101
Mercury Hotline (Mercury Refining Company)	800-833-3505
Metropolitan Water and Reclamation District	312-751-5600
Mine Safety and Health Administration (MSHA)	703-235-1452
National Animal Poison Control Center (24-Hour Hotline Operated at the University of Illinois)	800-548-2423
National Fire Protection Association (NFPA)	617-770-3000
National Institute of Occupational Safety and Health (NIOSH) Technical Information Source	800-356-4674
National Institute of Standards and Technology (NIST)	301-975-2000
National Pesticide Telecommunications Network (8:00 a.m. – 6:00 p.m. CT)	800-858-7378
National Radon Answering Service	800-438-4318
National Response Center/Coast Guard Command (Report Spills, Chemical Releases, Radiological Incidents)	800-424-8802
National Resources Defense Council	212-727-2700
National Technical Information Service (NTIS)	703-487-4600
NATLSCO	800-323-9585
NALCO Chemical Company (Mark Chaney's Pager)	708-999-0879
Nuclear Regulatory Commission	301-492-7000
Occupational Safety and Health Administration (OSHA) Hotline	800-321-6742
Office of Air Quality Planning and Standards	919-541-5616
People's Gas Company	312-431-3837
PPG Industries	304-843-1300
Safe Drinking Water Hotline	800-426-4791
Sigma Chemical Company	314-771-5765
Solid Waste Information Clearinghouse	800-677-9424
Stericycle	847-945-6550
STERIS Medical Products (Previously AMSCO)	800-333-8838
Substance Identification (Identify Chemical Substances by CAS Number or Name)	800-848-6538
Toxic Substances Control Act (TOSCA) Hotline	202-554-1404
U.S. Army Corps of Engineers	202-272-0001
U.S. Weather Bureau	708-298-1362
Wilpen Environmental Services	773-672-1093/31

General Emergency Response Items
Location: Geophysics B061

Item	Quantity
Decontamination Pools	2
Hand Air Pumps	2
Lakeland Deluxe Level A Suit (4-Lg and 4-XL)	8
PASS Devices	5
Positive Pressure Ventilators	2
Pressure Sprayers	2
Tyvek Suits (6-Med; 6-Lg; and 12-XL)	24
Self Contained Breathing Apparatus (SCBA)	8
Spare (SCBA) Cylinders (Check Pressure)	8

Emergency Response Cart/Bag Stock Supplies
Location: Geophysics B061

Item	Quantity
Absorbent Mini Booms	10
Absorbent Pillows	10
Acid Absorbent	2.5 Gallons
Aprons	5
Base Absorbent	2.5 Gallons
Chemical Resistant Gloves	10
Disposable Nitrile Gloves (1-Med; 1-Lg; and 1-XL)	3 Boxes
Duct Tape	1 Roll
Garbage Bags	50
Goggles	5
Hard Hats	1
Mercury Cartridges	10 Pair
Organic Solvent Absorbent Sponges	5
Organic Vapor/Acid Gas Cartridges	25 Pair
OV/AG/P100 (Combination) Cartridges	10 Pair
Overboots (5-Lg and 5-XL)	10
P100	10 Pair
Safety Glasses	5
Solvent Absorbent	2.5 Gallons
Silver Shield Gloves (5-Med and 5-Lg)	10

Emergency Response Bag Inventory

Item	Quantity
Eye Protection	
Chemical Splash Goggles	1 Pair
Safety Glasses	1 Pair
Spectacle Set	As Necessary
Hand Protection	
Chemical Resistant Gloves	2 Pair
Disposable Nitrile Gloves	3 Pair
Silver Shield Gloves	1 Pair
Foot Protection	
Overboots	2 Pair
Body Protection	
Apron	1
Hard Hat	1
Scrubs or Equivalent	Optional – You Provide
Respiratory Protection	
Full Face Respirator	1
Half Mask Respirator	1
Combo (OV/AG/P100) Cartridges	1 Pair
Mercury Vapor Cartridges	2 Pair
Organic Vapor/Acid Gas Cartridges	2 Pair
P-100 Filters	1 Pair
Other	
Flashlight	1
Garbage Bags	5
Notebook Pad/Pen	1
PH Paper	1 Roll
Water Bottle	1
Vest	1

The University of Chicago
Safety Manual
Occupational Safety and Health Programs

Section 3.5

Emergency Response Plan for Hazardous Materials

Policy

The following plan has been developed to minimize the severity of damage to human health and the environment in the event of an unexpected hazardous materials release.

Scope

The Emergency Response Plan for Hazardous Materials pertains to any hazardous chemical release, select agent release, confirmed fire, serious injury or death resulting from the release of a hazardous chemical or select agent.

Authority and Responsibility

The implementation of the Emergency Response Plan for Hazardous Materials program is the responsibility of various University Departments.

The *University Police Department* shall be responsible for:

1. Notifying the "On-Call" Safety Officer in the event of a hazardous chemical spill or select agent release, confirmed fire or an incident involving death or serious injury to an employee;
2. Initiating an evacuation of an area or building by orders of the On-Scene Incident Commander and securing the area to prevent access to unauthorized personnel; and
3. Notifying additional resources to request assistance as determined by the On-Scene Incident Commander.

Safety and Environmental Affairs shall be responsible for:

1. Providing a "On-Call" Safety Officer twenty-four hours a day, seven days a week;
2. Responding with appropriate action to control and remedy the incident;
3. Responding to a reported incident in a timely manner;
4. Maintaining liaison with the local Police and Fire Departments;
5. Notifying Administration of an incident and providing periodic status reports;
6. Reviewing and amending the Emergency Response Plan for Hazardous Materials; and
7. If a select agent or toxin are released the Responsible Official (Director of Safety) or the Alternate Responsible Officials must complete the form Report of Theft, Loss, or release of Select Biological Agent and Toxin, and forward to the CDC/APHIS.

Pre-Emergency Planning and Coordination

Arrangements have been made to coordinate the University's Emergency Response Plan for Hazardous Materials and applicable emergency services with the local Police Department, Fire Department and the Fire Department's Hazardous Materials Team. Copies of the plan and all revisions shall be submitted on

an annual basis or as the plan is amended to the aforementioned authorities.

Community contacts include:

- City of Chicago Police Department
District Commander
1121 South State Street
Chicago, Illinois
744-4000
- City of Chicago Fire Department
District Chief
5955 South Ashland Avenue
Chicago, Illinois 60636
747-5017
- City of Chicago Fire Department
Hazardous Materials Chief
558 West DeKoven Street
Chicago, Illinois 60607
747-6582

Meetings shall be held annually with personnel from these authorities. A representative from Safety and Environmental Affairs shall be responsible for scheduling annual meetings and recording minutes.

Copies of the University's Emergency Response Plan for Hazardous Materials shall be maintained at the facility within Safety and Environmental Affairs located at 5555 South Ellis Avenue, 2nd floor, Chicago, Illinois 60637 and within the University of Chicago's Safety Manual. Copies shall also be maintained at the facilities on-site emergency response carts located at:

- Henry Hinds Laboratory for Geophysical Sciences: Basement - 61; 5734 South Ellis Avenue;
- George Herbert Jones Laboratory: 104A; 5747 South Ellis Avenue; and
- Research Institutes Building: Enrico Fermi Institute, Basement North Stairwell; 5604 South Ellis Avenue.

The Emergency Response Plan for Hazardous Materials shall be reviewed and amended by Safety and Environmental Affairs on an annual basis and when any of the following situations occur:

1. Applicable regulations are revised;
2. Plan fails during an emergency;
3. List of emergency coordinators changes;
4. List of emergency equipment changes; or
5. Any facility change that would affect the plan.

Incident Notification

The University of Chicago Police shall be notified immediately upon discovery of an emergency incident by dialing 123 or 702-8181.

Chemical Spill

If an incident occurs within a University building or property which involves a chemical spill, the

University Police shall immediately notify the "On-Call" Safety Officer.

The "On-Call" Safety Officer, upon receiving the page, shall contact the University Police Dispatcher and gather information pertaining to the incident. Once information is obtained, the "On-Call" Safety Officer shall notify the Director of Safety and Safety and Environmental Affairs/Responsible Official or Senior Industrial Hygienist in his/her absence.

The Director of Safety and Safety and Environmental Affairs or Senior Industrial Hygienist shall advise the "On-Call" Safety Officer on the appropriate action to be initiated depending on the hazardous material involved and whether or not to activate the Emergency Response Team. If the Emergency Response Team is activated, refer to the section "Emergency Response Team" in this policy for duties.

Select Biological Agent and Toxin

If this event involves the release of a select biological agent and toxin evacuate the facility immediately, making sure that all doors are closed behind you. During situations where the spill involves amounts less than 500 milliliters the spill will be cleaned-up by the research group, and the facility will be decontaminated as necessary. If the spill is greater than 500 milliliters call the University Police Department at 123 or 702-8181 to activate the City of Chicago's Hazardous Materials Response Team. When calling the University Police make sure you inform the dispatcher that the incident involves a select biological agent and toxin; include the type and amount of material spilled or stored in the facility. The University of Chicago Police Department dispatcher will then make sure the Fire Department has this information.

Notification of Outside Agencies

When a reportable quantity of a hazardous material is released into the environment, it is necessary that certain regulatory agencies be contacted. The On-Scene Incident Commander from the Office of Safety and Environmental Affairs shall determine the need to report a release and consult with the University's Office of Legal Counsel prior to notification. The regulatory agency shall be provided with the following:

1. The location of the incident;
2. The name and telephone number of contact at the incident;
3. The type and amount of hazardous material released; and
4. The size of the area involved in the incident.

Please note, if the spill involving select biological agents and toxins a Form 0579 will also be required. This form must be sent to the appropriate agency identified elsewhere in this document, within 7 working days.

The outside agencies shall include the following:

- Illinois Environmental Protection Agency
Springfield, Illinois
(217) 782-7860; and
- National Response Center
Washington, D.C.
(800) 424-8802.
- Center for Disease Control

- USDA

In addition, the following people shall be notified and given information on the incident as soon as practical by the "On-Call" Safety Officer.

Risk Management Department

Glenn Klinksiek Phone: 702-3693 Pager: 753-1880 #9897

Administration

Glenn Klinksiek

University News and Community Affairs Phone: 702-8802
Vice President

Emergency Response Team

On-Scene Incident Commander

The Director of Safety and Safety and Environmental Affairs or Senior Industrial Hygienist shall be the On-Scene Incident Commander. In the absence of the above On-Scene Incident Commander, the most senior Hazardous Materials Technician shall assume the On-Scene Incident Commander duties.

Duties may include:

1. Activating the Emergency Response Plan for Hazardous Materials and Hazardous Materials Response Team;
2. Identifying hazards and risks involved in an emergency response situation;
3. Activating internal facility alarms or communication systems to notify all applicable personnel;
4. Notifying, if needed, the Police Department, Fire Department, and any applicable State and Federal organizations;
5. Should the event involve a select Biological Agent and toxin, sending written confirmation of the incident to the CDC/APHIS.
6. Assuming overall authority for managing the emergency unless higher command arrives (e.g., Fire Department Chief);
7. Performing emergency response termination procedures; and
8. Conducting emergency response critique and arranging follow-up procedures.

Hazardous Materials Technician

The Hazardous Materials Technicians include staff from Safety and Environmental Affairs and Radiation Safety (Senior Industrial Hygienist, Industrial Hygienists, Safety Officer and Radiation Safety Officers).

The Hazardous Materials Technician shall perform all duties assigned by the On-Scene Incident Commander consistent with his/her training.

Duties of the Hazardous Materials Technician may include:

1. Implementing the Emergency Response Plan for Hazardous Materials;
2. Selecting and using monitoring equipment;

3. Selecting and using specialized personal protective equipment (PPE);
4. Performing advanced control, containment and/or confinement operations;
5. Implementing decontamination procedures;
6. Participating in hazard and risk assessment of the site and termination procedures; and
7. Participating in the development of site safety and control plan.

One Hazardous Materials Technician shall be given the title of *Entry Team Leader*. The Entry Team Leader shall be chosen by the On-Scene Incident Commander.

Duties of the *Entry Team Leader* may include:

1. Coordinating emergency response zones with the On-Scene Incident Commander;
2. Coordinating entry plans with the On-Scene Incident Commander;
3. Coordinating decontamination activities with the On-Scene Incident Commander; and
4. Supervising entry team activities.

Emergency Medical Team

Persons injured at the scene of the incident shall be provided with medical care. To obtain medical care, contact the City of Chicago Fire Department Emergency Medical Service by calling 911.

Site Safety Officer

The Site Safety Officer advises the On-Scene Incident Commander on all aspects of health and safety on site and recommends stopping work if any operation threatens worker or public health or safety.

Duties of the Site Safety Officer may include:

1. Enforcing the "buddy" system;
2. Conducting periodic inspections to ensure safety;
3. Monitoring onsite hazards and conditions;
4. Monitoring the work parties for signs of stress, such as cold exposure, heat stress and fatigue;
5. Controlling entry and exit at the access control points;
6. Selecting protective clothing and equipment;
7. Ensuring that protective clothing and equipment are properly stored and maintained;
8. Periodically inspecting protective clothing and equipment.

Incident Follow-up

After each incident, the incident and Emergency Response Plan shall be reviewed and revised as necessary. This review shall involve answering the following questions:

- Cause: What caused the emergency?
- Prevention: Was it preventable? If so, how?
- Procedures: Were inadequate or incorrect orders given or actions taken? Were these the result of bad judgment, wrong or insufficient information, or poor procedures? Can procedures or training be improved?
- Site profile: How does the incident affect the site profile? How are other site cleanup activities affected?
- Community: How is community safety affected?

- Liability: Who is liable for damage payments?

Training Requirements

First Responder Awareness Level

The First Responder Awareness Level are employees of the University who are likely to discover a hazardous materials release.

Training shall include:

1. Risks associated with hazardous materials;
2. The recognition of the presence of hazardous materials;
3. Identification of hazardous materials;
4. Notification procedures; and
5. Basic decontamination procedures.

Initial required training and continuing education requirements for emergency response personnel are based on the duties and functions to be performed by each responder during an emergency response situation. The required training and continuing education courses shall be conducted by a training facility with qualified instructors as required by the governing regulation.

On-Scene Incident Commander

The On-Scene Incident Commander shall be a trained Hazardous Materials Technician. A minimum of eight hours On-Scene Incident Commander training or equivalent experience is required initially and eight hours of continuing education annually thereafter. The training shall include:

1. Risks associated with hazardous material incidents;
2. Potential outcomes of hazardous material incidents;
3. Advanced hazard and risk assessment techniques;
4. The selection and usage of personal protective equipment;
5. Advanced control, containment and confinement operations;
6. Decontamination procedures; and
7. The resources available during an incident.

Hazardous Materials Technician

The Hazardous Material Technician shall be required to complete 24 hours of required training and eight hours of continuing education annually thereafter. The training shall include:

1. Identifying hazardous materials;
2. Risks associated with hazardous material incidents;
3. The incident command system;
4. Advanced control, containment and confinement operations;
5. Advanced decontamination procedures; and
6. The classification, identification and verification of known and unknown materials.

Communication

The On-Scene Incident Commander shall be in charge of all communication when an emergency response situation is under the University's control. When outside personnel are called for assistance, the On-Scene Incident Commander and the "On-Call" Safety Officer shall be the primary communication sources for the University of Chicago.

The following authorities may be contacted for assistance:

- Police Department;
- Fire Department; and
- Fire Department Hazardous Materials Team.

Outside emergency Response Companies which may be contacted by Safety and Environmental Affairs, if necessary, include any of the below listed companies.

- WilPen Environmental
7325 West Irving Park Road
Suite 179
Chicago, Illinois 60634
(773) 736-4076
- Clean Harbors
Midwest Region
11800 South Stony Island Avenue
Chicago, Illinois 60617
(773) 646-6202
- Mars Environmental Solutions, Inc.
8110 West 185th Street
Mokena, Illinois 60448
(708) 532-2255
- Emergency Technical Services Corporation
1111 Lunt
Schaumburg, Illinois
(708) 980-3872

Outside companies may be contacted by the On-Scene Incident Commander for additional supplies such as absorbents, personal protective equipment, plug and dike, salvage drums and emulsifiers. Companies include:

- Environmental Safety Group
7545 South Madison Avenue
Hinsdale, Illinois 60521
1-800-242-4295
Fax (708) 323-0191

Site Characterization and Analysis

The following factors shall be considered during the preliminary evaluation to assist in determining the appropriate plan of action:

1. Whether the incident could involve a fire, spill, release or leak;
2. The quantity of the material and its harmful nature;

3. The type of container and its condition;
4. The location, time and weather conditions;
5. Any exposures to life, property and the environment; and
6. Available resources.

To determine the appropriate plan of action, the following reference materials are recommended:

1. Area blueprints;
2. Chemical inventory list;
3. Computerized material safety data sheet (MSDS) system to help evaluate chemicals and materials present in the site area;
4. Poison Control Center to help evaluate chemicals and possible exposure effects to on-site victims and response personnel;
5. NIOSH Pocket Guide to Hazardous Materials;
6. National Fire Protection Association Handbook of Hazardous Materials;
7. Department of Transportation Emergency Response Guidebook; and
8. The University of Chicago Pre-Fire Safety Plans.

During an incident, a more detailed evaluation of the site's specific characteristics shall be performed by emergency response team members. The entry team shall identify existing site hazards to the On-Scene Incident Commander. This information will aid in the selection of appropriate engineering, containment and clean-up controls, as well as the selection of personal protective equipment for remaining response team members and support staff members.

Site Control

Purpose

To prevent employee/visitor contamination and harm during emergency response activities, site control activities including the following shall be used:

1. Site maps (e.g., blueprints, floor exit plans);
2. Designation of hot, warm and cold zones;
3. Communication center (a central location where all communications and plans will originate); and
4. Emergency decontamination protocol.

The site shall be controlled and maintained by the University of Chicago Police Department and/or local Police Department personnel.

The On-Scene Incident Commander shall use information provided from the site characterization and analysis survey to determine the three emergency response zones (Hot Zone, Warm Zone and Cold Zone). The aforementioned zones shall be determined by using the following guidelines.

Hot Zone

The area containing the incident itself, including the product and its container. This area may be immediately dangerous to life and health (IDLH). Personnel permitted in this zone shall be dressed in the appropriate personal protective equipment.

Warm Zone

A larger geographical area surrounding the Hot Zone that is considered safe for workers to enter with limited personal protective equipment unless assigned a task requiring increased protection.

Cold Zone

The area adjacent to the Warm Zone that is restricted to administration and emergency response personnel. Minimum personal protective equipment may be required such as protective gloves and Tyvek coveralls.

Spill Control

Basic Control

Basic control is the first step taken to prevent further release of the hazardous materials. Basic control may include shutting off a valve or shutting down a piece of machinery.

Extinguishment

When a hazardous material incident involves fire, the following procedure shall be initiated:

1. Notify the Fire Department by calling the University Police at 123 or 702-8181;
2. Determine the type of hazardous material in the fire; and
3. Before attempting to extinguish the fire, determine if the hazardous material involved is compatible with the extinguishing media. The Material Safety Data Sheet and other references will assist you in determining what type of extinguisher can be used.

Containment

There are four types of procedures that can be taken to keep the involved material in its container.

1. Shut-off Valves: Shut-off valves may cause spills or releases. Ensure that all shut-off valves on the affected cylinder and/or drums are properly closed and secured.
2. Plugging: Plugging devices may be placed or pounded into a penetration to stop a leak. Pieces of wood, golf tees, soap or stakes wrapped with cloth may be used. Metal objects shall not be used for plugging purposes due to the possibility of sparking.
3. Patching: Materials like clay or putty may be used to patch a leak. Look for decomposition of the patching compound as well as the possibility of the build-up of internal pressure, which could cause the patch to fail.
4. Overpacking: Overpacking is accomplished by placing a damaged container into a larger undamaged container.

Confinement

There are three types of procedures which can be used to keep a material in a confined area.

1. Diking: Materials like sand, earth, straw or absorbent material can be placed around the perimeter of the leak. The type of diking material used shall be compatible with the spilled hazardous material.
2. Blocking: Drains, ditches or storm sewers shall be covered or diked to prevent run-off of spilled materials. Blocking can be accomplished with absorbent pads or a heavy piece of plastic.

3. Absorption: Run-off can sometimes be absorbed with dirt, sand, soda ash, saw dust, vermiculite or other absorbent materials. The absorbent material shall be positioned so that the spilled material runs into it. Care shall be taken to ensure that the absorbent is compatible with the spill.

Monitoring Equipment

Quantitative measurements of hazardous materials within the environment shall be made prior to any entry.

Monitoring shall be conducted at the completion of a response to determine if the area is safe for re-entry.

The following quantitative instruments shall be used in hazardous atmospheric assessments.

1. TMX410 Gas Meter to determine if the atmosphere is at an explosive level and if adequate oxygen is present;
2. Dragger and/or Sensidyne Tubes to determine and/or identify the concentration of chemicals present in the atmosphere;
3. pH paper to determine the pH of a substance for proper neutralization; and
4. Miran IBX to measure over 100 common toxic compounds and their concentrations.

Decontamination

All clothing, equipment or person(s) assigned to duties in the Hot or Warm Zones shall be decontaminated to remove the presence of any hazardous materials encountered. The decontamination area shall be set-up prior to the mitigation of the incident.

Decontamination can be accomplished by:

1. Physically removing contaminants (e.g., liquid rinse, evaporation);
2. Inactivating contaminants by chemical detoxification (e.g., neutralizing agents); and
3. Disinfecting/sterilizing infectious or biological materials (e.g., bleach solution).

The decontamination procedures shall be initiated by the On-Scene Incident Commander. To ensure that the proper decontamination procedures are initiated, the Incident Commander shall make reference to following:

1. Material Safety Data Sheets;
2. The National Fire Protection Association Hazardous Materials Handbook;
3. The chemical manufacturer;
4. Chemtrec; and
5. Other related reference materials.

Once the proper decontamination procedures are determined, the On-Scene Incident Commander shall designate an area within the Warm Zone to set up the decontamination process. The equipment shall consist of portable wash tubs, sprayers, heavy gauge plastic tarp and disposable scrub brushes.

The following eight steps constitute the decontamination process for personnel involved in the remediation of the incident.

1. All personnel exiting the Hot Zone shall place monitoring equipment, hand tools and other equipment in this area. A recovery drum and/or tarp shall be set in place so all tools and equipment can be put aside for further decontamination. All equipment and tools shall be decontaminated when work is concluded in accordance with the *Decontamination of Equipment* section in this policy. Personal protective clothing, self-contained breathing apparatus and/or respirators worn by personnel are excluded at this stage and shall remain worn by personnel.
2. After placing equipment and tools in the recovery drum or on tarps, all persons who have been within the Hot Zone shall be washed down with the appropriate solution, as determined by the Material Safety Data Sheet, while wearing all personal protective equipment. All water used in this step shall be contained in a recovery drum or decontamination pool while this process is carried out and treated as hazardous waste at the completion of the decontamination process.
3. After emergency response personnel are completely washed down, they shall remove their protective clothing. The protective clothing shall be placed in a recovery drum or approved bag and labeled with a tag as to their contents. Support personnel may be required to assist personnel being decontaminated with removing their protective clothing.
4. After removing protective clothing, personnel being decontaminated shall remove their self-contained breathing apparatus or respirators. The breathing apparatus shall be placed on a tarp for further decontamination. For decontamination procedures of breathing apparatus and respirators, refer to the section in this policy for the Decontamination of Self Contained Breathing Apparatus.
5. Upon removing the personal protective equipment, the emergency response personnel shall remove any clothing that may have become contaminated. The clothing shall be placed in recovery drums or approved bags and labeled as to its contents.
6. Emergency response personnel shall shower thoroughly if it has been determined that personal protective equipment has failed to protect the user.
7. Emergency response personnel and persons that were in the Hot Zone and Warm Zone shall receive a post-medical evaluation by a qualified individual if overexposure or injury occurs.
8. If it is determined that emergency response personnel or persons involved with the incident need further medical attention, transportation shall be arranged by the On-Scene Incident Commander.

Decontamination of Equipment

Decontamination of equipment shall be performed by using portable wash tubs, sprayers, and disposable scrub brushes. Any equipment that cannot be thoroughly decontaminated along with the contents from the wash tub shall be considered hazardous and shall be stored and disposed of in accordance with the University of Chicago's Hazardous Materials Management policy, Section 6.2.

Monitoring Equipment

If monitoring equipment becomes contaminated, it shall require special cleaning techniques. Methods for decontamination shall be obtained from the EPA's Regional Office (312) 353-2000 or the equipment's manufacturer.

Hand Tools

Emergency response hand tools shall be cleaned as appropriate by chemical or physical means. The EPA's Regional Office may be consulted at (312) 353-2000 for specific methods of decontaminating the hand tools. At the end of the incident, if the hand tools cannot be decontaminated, they shall be disposed of as hazardous waste.

Office and Laboratory Items

Use the same decontamination techniques used for hand tools and monitors.

Equipment that cannot be decontaminated shall be disposed of as hazardous waste. The equipment shall be replaced immediately or as funding is secured.

Decontamination of Respirators and Self-Contained Breathing Apparatus

Personnel responsible for the decontamination of respirators shall follow the "Maintenance of Respirators" section of the University of Chicago's Respiratory Protection Program, Section 3.6.

Personal Protective Equipment

Emergency response personnel shall use appropriate personal protective equipment for each assigned job.

The following personal protective equipment shall be available for use depending on the requirements of the situation and the training of the individual response personnel:

1. Positive pressure self-contained breathing apparatus;
2. Totally encapsulating chemical protective suits capable of maintaining positive air pressure and capable of preventing inward gas leakage of more than 0.5%;
3. Chemical resistant gloves and boots;
4. Air purifying half-mask or full-face respirator with appropriate cartridges;
5. Chemical resistant total body coverall Tyvek suits;
6. Chemical resistant goggles; and
7. Personal Alerting Safety System (PASS) device.

Medical Surveillance

All members of the Emergency Response Team shall be placed in the medical surveillance program. Medical examinations and consultations shall be made to each employee on the following schedules:

- Prior to assignment;
- At least once every twelve months for each employee covered unless the attending physician believes a longer interval (not greater than biennially) is appropriate;
- At termination of employment or reassignment to an area where the employee would not be covered if the employee has not had an examination within the last six months;
- As soon as possible upon notification by an employee that the employee has developed signs or symptoms indicating possible overexposure to hazardous substances or health hazards, or that the employee has been injured or exposed above the permissible exposure limits or published exposure levels in an emergency situation; and
- At more frequent times, if the examining physician determines that an increased frequency of examination is medically necessary.

Section 3 Index

Table of Contents

Safety and Environmental Affairs

Issued: 01/24/96

Revised: 08/13/03

Attachment H

UC Waste Analyses



WILPEN
ENVIRONMENTAL
SERVICES, INC.

MAILING ADDRESS

P.O. Box 30014
Chicago, IL 60630-0014

OFFICE ADDRESS

4750 N. Milwaukee Ave.
Suite #14
Chicago, IL 60630

Deliver this fax to: Todd Brown

Total pages including this page: 6 ~~7~~ Date: 8-26-04

Name of sender: Mike Wilk Number: 312-353-4342

Per your request, the waste
analysis you requested for the
University of Chicago.

08/26/2004 11:03 FAX 613 541 1638

ENVIRONMENTAL ENTERPRISE

005

Environmental Enterprises, Inc.

Waste Receipt Worksheet

Profile # X60828

Date 5/6/04

Generator University of Chicago

5555 South Ellis

Chicago, IL 60637

HCT #s 04-11422-40

Drum Number: 04-11422

Manifest # 02938

Description Solvent, High BTU, Low Halogenated

No. of Containers 19

Total Quantity 280 Units G

Container Sizes 15X15

Sampled If submitted to lab, Lab # 510125 PSS #

Anticipated Treatment T50 FL

Actual Treatment T50 FL

Comments

Offsite Facility

Notes BTU >10,000; pumpable w/<1" solids. 536.00/ 15 gal

Q.A. Data As Received

As Profiled		Q.A. Data As Received	
Color	Dark	DARK	
Layers	<input type="checkbox"/> Single <input checked="" type="checkbox"/> Bi <input type="checkbox"/> Multi	<input type="checkbox"/> Single <input checked="" type="checkbox"/> Bi <input type="checkbox"/> Multi	
Physical State	<input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid	<input type="checkbox"/> Solid <input checked="" type="checkbox"/> Liquid	
	<input type="checkbox"/> Powder <input type="checkbox"/> Sludge	<input type="checkbox"/> Powder <input type="checkbox"/> Sludge	
	<input type="checkbox"/> Fused <input type="checkbox"/> Gas	<input type="checkbox"/> Fused <input type="checkbox"/> Gas	
pH	<input type="checkbox"/> <2 <input type="checkbox"/> 4-6 <input type="checkbox"/> 8-10 <input type="checkbox"/> >12.5	<input type="checkbox"/> <2 <input type="checkbox"/> 4-6 <input type="checkbox"/> 8-10 <input type="checkbox"/> >12.5	
	<input type="checkbox"/> 2-4 <input checked="" type="checkbox"/> 6-8 <input type="checkbox"/> 10-12.5 Actual 7	<input type="checkbox"/> 2-4 <input type="checkbox"/> 6-8 <input type="checkbox"/> 10-12.5 Actual NT	
Halogens	<input checked="" type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input type="checkbox"/> >20	<input checked="" type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input type="checkbox"/> >20	
	<input type="checkbox"/> 1-5 <input type="checkbox"/> 10-20 Actual 7	<input type="checkbox"/> 1-5 <input type="checkbox"/> 10-20 Actual	
Viscosity	<input checked="" type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	<input checked="" type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High	
% Suspended Solids	<input checked="" type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input type="checkbox"/> >20	<input checked="" type="checkbox"/> <1 <input type="checkbox"/> 5-10 <input type="checkbox"/> >20	
	<input type="checkbox"/> 1-5 <input type="checkbox"/> 10-20 Actual	<input type="checkbox"/> 1-5 <input type="checkbox"/> 10-20 Actual	
Flash Point	<input checked="" type="checkbox"/> <100 <input type="checkbox"/> 140-200	<input type="checkbox"/> <100 <input type="checkbox"/> 140-200	
	<input type="checkbox"/> 100-140 <input type="checkbox"/> >200 Actual 93F	<input type="checkbox"/> 100-140 <input type="checkbox"/> >200 Actual <140	
Waste Codes	D001 D018 D022 D038 F002 F003 F005 D036		

Odor	<input type="checkbox"/> None <input checked="" type="checkbox"/> Mild <input type="checkbox"/> Strong	<input type="checkbox"/> None <input checked="" type="checkbox"/> Mild <input type="checkbox"/> Strong
Cyanide (if pH>5)	<input checked="" type="checkbox"/> Cyanide Total - None <input checked="" type="checkbox"/> Cyanide Amendable - None	<input type="checkbox"/> Cyanide Total - None <input type="checkbox"/> Cyanide Amendable - None
	<input type="checkbox"/> Cyanide Total >250ppm <input type="checkbox"/> Cyanide Amendable >30ppm	<input type="checkbox"/> Cyanide Total >250ppm <input type="checkbox"/> Cyanide Amendable >30ppm
	Cyanide Total	Cyanide Amendable
Heat Content (x1000)	<input type="checkbox"/> <2 <input type="checkbox"/> 5-10 <input type="checkbox"/> >16	<input type="checkbox"/> <2 <input type="checkbox"/> 5-10 <input type="checkbox"/> >16
	<input type="checkbox"/> 2-5 <input checked="" type="checkbox"/> 10-16 BTU Actual 13,000	<input type="checkbox"/> 2-5 <input type="checkbox"/> 10-16 BTU Actual 7,500

Permitted (Y/N)	<input checked="" type="checkbox"/>	Minor Variance	<input checked="" type="checkbox"/>	Off-spec	<input type="checkbox"/>	0
Unacceptable				Initial	DC2	
Comments						

(Record comments such as submitted to lab for..., how inconsistencies were resolved, any additional information)



1380 Busch Parkway
Buffalo Grove, Illinois 60089

Email: info@glalabs.com
(847) 808-7766 FAX (847) 808-7772

Wilpen Environmental Services
PO Box 30014
Chicago, IL 60630-0014

Project: U of C
Project Number: N/A
Project Manager: Mike

Reported:
03/24/04 15:19

Polychlorinated Biphenyls by EPA Method 8082

Great Lakes Analytical--Buffalo Grove

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
PCB Oil Test (B403409-01) OIL Sampled: 03/18/04 15:00 Received: 03/19/04 16:30									
PCB-1016	ND	3.50	mg/kg	1	4030524	03/22/04	03/22/04	EPA 8082	
PCB-1221	ND	3.50	"	"	"	"	"	"	
PCB-1232	ND	3.50	"	"	"	"	"	"	
PCB-1242	ND	3.50	"	"	"	"	"	"	
PCB-1248	ND	3.50	"	"	"	"	"	"	
PCB-1254	ND	3.50	"	"	"	"	"	"	
PCB-1260	ND	3.50	"	"	"	"	"	"	
Surrogate: Tetrachloro-meta-xylene		210 %	10-125	"	"	"	"	"	H
Surrogate: Decachlorobiphenyl		165 %	10-143	"	"	"	"	"	H

Great Lakes Analytical--Buffalo Grove

Andy Johnson

Andy Johnson, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



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Wilpen Environmental Services
PO Box 30014
Chicago, IL 60630-0014

Project: U of C
Project Number: N/A
Project Manager: Mike

Reported:
03/24/04 15:19

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
PCB Oil Test	B403409-01	OIL	03/18/04 15:00	03/19/04 16:30

Great Lakes Analytical—Buffalo Grove

Andy Johnson

Andy Johnson, Project Manager

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Chicago, IL 60630-0014

Project: U of C
Project Number: N/A
Project Manager: Mike

Reported:
03/24/04 15:19

Polychlorinated Biphenyls by EPA Method 8082 - Quality Control
Great Lakes Analytical--Buffalo Grove

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%RBC	%REC Limits	RPD	RPD Limit	Notes
Batch 4030524 - EPA 3580A (Dilution)										
Blank (4030524-BLK1)				Prepared & Analyzed: 03/22/04						
PCB-1016	ND	3.50	mg/kg							
PCB-1221	ND	3.50	"							
PCB-1232	ND	3.50	"							
PCB-1242	ND	3.50	"							
PCB-1248	ND	3.50	"							
PCB-1254	ND	3.50	"							
PCB-1260	ND	3.50	"							
Surrogate: Tetrachloro-meta-xylene	2.58		"	1.00		258	10-125			H
Surrogate: Decachlorobiphenyl	3.93		"	1.00		393	10-143			H
LCS (4030524-B51)				Prepared & Analyzed: 03/22/04						
PCB-1016	4.90	3.50	mg/kg	5.00		98.0	10-133			
PCB-1260	4.19	3.50	"	5.00		83.8	14-134			
Surrogate: Tetrachloro-meta-xylene	2.36		"	1.00		236	10-125			H
Surrogate: Decachlorobiphenyl	3.75		"	1.00		375	10-143			H
Duplicate (4030524-DUP1)				Source: B403409-01 Prepared & Analyzed: 03/22/04						
PCB-1016	ND	3.50	mg/kg		ND				20	
PCB-1221	ND	3.50	"		ND				20	
PCB-1232	ND	3.50	"		ND				20	
PCB-1242	ND	3.50	"		ND				20	
PCB-1248	ND	3.50	"		ND				20	
PCB-1254	ND	3.50	"		ND				20	
PCB-1260	ND	3.50	"		ND				20	
Surrogate: Tetrachloro-meta-xylene	2.25		"	0.989		228	10-125			H
Surrogate: Decachlorobiphenyl	1.65		"	0.989		167	10-143			H

Great Lakes Analytical--Buffalo Grove

Andy Johnson

Andy Johnson, Project Manager

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Project: U of C
Project Number: N/A
Project Manager: Mike

Reported:
03/24/04 15:19

Notes and Definitions

DET Analyte DETECTED
ND Analyte NOT DETECTED at or above the reporting limit
NR Not Reported
dry Sample results reported on a dry weight basis
RPD Relative Percent Difference
L This quality control measurement is below the laboratory established limit.
H This quality control measurement is above the laboratory established limit.

Great Lakes Analytical--Buffalo Grove Wisconsin DNR Certification Lab ID: 999917160

Great Lakes Analytical--Buffalo Grove NELAP Primary Accreditation: Illinois #100261

Great Lakes Analytical--Buffalo Grove NELAP Secondary Accreditation: New Jersey #IL001

Great Lakes Analytical--Oak Creek, WI Wisconsin DNR Certification Lab ID: 341000330

Great Lakes Analytical--Oak Creek, WI NELAP Primary Accreditation: Illinois #100307

Note: All analytes, by matrix and method, are accredited following current NELAP standards unless specifically noted by way of a qualifier listed above.

Great Lakes Analytical--Buffalo Grove

Andy Johnson, Project Manager

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

COPY VIA TELEFAX
ORIGINAL HAND DELIVERED

Robert L. Graham
Christine A. Picker
Jenner & Block
One IBM Plaza
Chicago, Illinois 60611

Re: In the Matter of
University of Chicago
No. V-W-024 92

Dear Mr. Graham and Ms. Picker:

I understand that your client expressed serious concern that the Paragraph A. at page three of the proposed Consent Agreement and Final Order (CAFO) in this matter could be understood to mean that University of Chicago would not be permitted to alter its status as a treatment, storage, disposal facility subject to 40 CFR. We believe that this interpretation could not be reasonably inferred from the language of the CAFO. This CAFO does not limit your client's ability either to amend its RCRA permit, or if the facility no longer stores hazardous waste for more than ninety days, to close its treatment, storage, or disposal facility.

To further allay your client's concerns you may want to underscore that only the state permit standards apply to previously unregulated toxicity characteristic (TC) waste in an already regulated unit as illustrated by the enclosed page of the Toxicity Characteristics Final Rule, 55 Fed.Reg. at 11848 (March 29, 1990).

Assuming the University of Chicago accepts only on-site waste and has not experienced any releases requiring corrective action, once the facility no longer stores hazardous wastes for more than ninety (90) days the closure process should follow the applicable Subpart G: Closure and Post-Closure requirements found at 35 Ill. Adm. Code § 724.210 et seq. (Applicable portions of which I have enclosed.) According to Juana Roho, U.S. EPA Permit Writer, IEPA also provides a checklist form for facilities

seeking to close. The University of Chicago should contact their state permit contact to obtain the closure checklist.

I hope that this letter and the attached information will adequately alleviate your client's concerns about the University's continued ability to alter its RCRA status. I have also enclosed the proposed CAFO which corrects the typographical error you noted and the name of the facility contact person. Please have your client execute the CAFO and return it to me as quickly as possible.

Sincerely,

Mary L. Fulghum
Associate Regional Counsel

enc.

JRC YELLOW

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

UNIVERSITY OF CHICAGO
5801 SOUTH ELLIS AVENUE
CHICAGO, ILLINOIS 60637

EPA I.D. NO.: ILD 005 421 136

) DOCKET NO.: V-W-024-92
)
)
)
)
)
)
)

CONSENT AGREEMENT AND
FINAL ORDER

PREAMBLE

On September 10, 1993, a Complaint was filed in this matter pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. Section 6928, and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Associate Director of the Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is the University of Chicago, 5801 South Ellis Avenue, Chicago, Illinois 60637.

STIPULATIONS

The Parties, desiring to settle this action, enter into the following stipulations:

1. Respondent has been served with a copy of the Complaint, Findings of Violation and Compliance Order (Docket No. V-W-024-92 in this matter.

2. Respondent owns and operates a facility located at 5801 South Ellis Avenue, Chicago, Illinois 60637.

3. Respondent admits the jurisdictional allegations contained in the Complaint.

4. Respondent neither admits nor denies the specific factual allegations contained in the Complaint other than admissions made in Respondent's Answer.

5. Respondent explicitly waives its right to a hearing on the allegations contained in the Complaint.

6. Should the Respondent fail to comply with any provision contained in the subsequent Final Order, Respondent waives any rights it may possess in law or equity to challenge the authority of the U.S. EPA to bring a civil action in the appropriate United States district court to compel compliance with the Final Order and/or to seek an additional penalty for the non-compliance.

7. Respondent consents to the issuance of the Order hereinafter set forth and hereby consents to the payment of a civil penalty in the amount therein specified.

8. On March 29, 1990, U.S. EPA promulgated the HSWA mandated toxicity characteristic (TC) Rule to replace the Extraction Procedure (EP) Toxicity characteristic (EP) for the identification of hazardous waste. The TC rule adds 25 new organic constituents to the original 14 regulated EP constituents. Under the permit

modification procedures established by the TC Rule, permitted facilities that manage TC wastes must submit Class 1 permit modifications to the appropriate EPA Regional Office by the TC Rule effective date, September 25, 1990, if they are to continue managing the newly regulated TC wastes in units that require a permit. See the March 29, 1990, Federal Register (55 FR 11798).

9. This Consent Agreement and Final Order shall become effective on the date it is signed by the Director of the Waste Management Division, Region V, U.S. EPA.

FINAL ORDER

Based on the foregoing stipulations, the parties agree to the entry of the following Final Order:

A. Respondent will maintain compliance with the conditions of its RCRA permit. Any management of hazardous waste not authorized in the RCRA permit is prohibited.

B. A copy of all correspondence with U.S. EPA regarding this Final Order shall be submitted to the Waste Management Division, U.S. EPA, Region V, 77 West Jackson Street, Chicago, Illinois 60604, Attention: Barbara Russell, RCRA Enforcement Branch (HRE-8J) and also be submitted to Scott Phillips, Senior Attorney, Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, Illinois 62706.

C. Respondent shall pay a civil penalty in the amount of FIFTEEN THOUSAND TEN DOLLARS (\$15,010.00) payable to the Treasurer of the United States of America

within thirty (30) days of the effective date of this Order. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (MFA-10J), and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (CS-3T), U.S. EPA, 77 West Jackson Blvd., Chicago, Illinois 60604-3590.

The U.S. EPA may collect interest on any amounts overdue under the terms of this Final Order at the rate established by the Secretary of Treasury pursuant to 31 U.S.C. Section 3717. A late payment handling charge of \$20.00 will be imposed on any late payment, with an additional charge of \$10.00 for each subsequent 30-day period over which an unpaid balance remains.

Failure to comply with any requirement of this Final Order may subject Respondent to liability for a penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued non-compliance with the terms of the Final Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

This Order constitutes a settlement and final disposition of the Complaint filed in this case and stipulations hereinbefore recited.

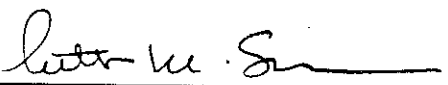
Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. Section 6973, or other statutory authority should U.S. EPA find that the handling, storage,

treatment, transportation, or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provisions of 40 CFR Parts 124 and 270; and this Order.

SIGNATORIES

Each undersigned representative of a Party to this Consent Agreement and Final Order consisting of 6 pages certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such Party to this document.

Agreed to this 21st day of October, 1993.

By 
For the University of Chicago
Respondent

Title GENERAL COUNSEL and VICE-PRESIDENT FOR ADMINISTRATION AND
FOR ARGONNE NATIONAL LABORATORY

Agreed this _____ day of _____, 1993.

By _____
Norman R. Niedergang
Associate Division Director
Office of RCRA, Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above being agreed and consented to, it is so ordered

this _____ day of _____, 1993.

William E. Muno, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V

IN THE MATTER OF:

UNIVERSITY OF CHICAGO
5801 SOUTH ELLIS AVENUE
CHICAGO, ILLINOIS 60637
DOCKET NO. V-W-024-92

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Consent Agreement and Final Order to be served upon the person's designated below, on the date below, by causing said copies to be delivered:

By 1st Class Mail to: Arthur Sussman
 Registered Agent
 The University of Chicago
 5801 South Ellis Avenue
 Chicago, Illinois 60637

Hand delivery to: Robert L. Graham
 Jenner & Block
 One IBM Plaza
 Chicago, Illinois 60611

 Steve Beaudoin
 Facility Contact
 Office of Safety and
 Environmental Affairs
 The University of Chicago
 5801 South Ellis Avenue
 Chicago, Illinois 60637

I have further caused the original of the Consent Agreement and Final Order and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 77 West Jackson Blvd., Chicago, Illinois 60604, on the date below.

This is said person's last known address to the subscriber.

Dated this _____ day of _____ 1993.

Secretary, RCRA ENFORCEMENT BRANCH
U.S. EPA, REGION V

SIGN-OFF FOR THE OFFICE OF REGIONAL COUNSEL									
	Aut./ Atty	Sec. Secy.	Sec. Chief	Br. Secy.	Branch Chief	RC/DRC Secy.	DRC	RC	Other
Init.	WJH		WJH						
Date	11/8/93		11/10/93						

WFM
11/12/93

LAW OFFICES

JENNER & BLOCK

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ONE IBM PLAZA
CHICAGO, ILLINOIS 60611

(312) 222-9350

(312) 527-0484 FAX

RECEIVED
DEC 8 1992

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION VI

WASHINGTON OFFICE
601 THIRTEENTH STREET, N.W.
SUITE 1200 SOUTH
WASHINGTON, D.C. 20005
(202) 639-6000
(202) 639-6066 FAX

LAKE FOREST OFFICE
ONE WESTMINSTER PLACE
LAKE FOREST, IL 60045
(708) 295-9200
(708) 295-7810 FAX

MIAMI OFFICE
ONE BISCAYNE TOWER
MIAMI, FL 33131
(305) 530-3535
(305) 530-0008 FAX

ROBERT L. GRAHAM

December 7, 1992

FOR SETTLEMENT DISCUSSION
PURPOSES ONLY

Mary Fulgham, Esq.
United States Environmental
Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: **In The Matter Of:**
The University of Chicago
5801 South Ellis Avenue
Chicago, Illinois 60637
EPA I.D. NO. ILD 005 421 136

RECEIVED
WMD RCRA
RECORD CENTER

APR 15 1993

Compliance

Dear Ms. Fulgham:

In accordance with our recent settlement discussions in this matter, this letter will provide you with the additional factual information you requested from the University of Chicago. If you have not already received it, you will soon be receiving a copy of our Answer, filed in response to the EPA's September 10, 1992 Complaint (Docket No. V-W-024 92). As we have discussed, we filed this Answer when it was due, but remain hopeful of resolving this matter with you by agreement.

According to Dr. Wang, the University uses benzene, chloroform, carbon tetrachloride and trichloroethylene only as solvents. This is significant, because as you and Ms. Rojo have stated, the University did not need to renotify the EPA of its use of solvents bearing F-codes when filing its amended Part A permit application. Although all four substances have been used solely as solvents, we understand that three of them have F-codes; apparently, chloroform does not have an associated F-code. Given both that the EPA had

Mary Fulgham, Esq.
December 7, 1992
Page 2

notice of the use of these four substances in the original Part A permit application, and that renotification for solvents was not required, we respectfully suggest to you that the timing of the filing of the University's amended Part A permit application should not result in any determination that RCRA has been violated.

Upon review of University policy and dates of the hazardous waste shipments, we are also informed that it is the University's practice to have its wastes shipped off of the premises before they have accumulated for ninety days. For your information, we attach a list showing the dates when wastes were shipped from the University's premises since August, 1990. As you know, facilities that accumulate wastes on-site for less than ninety days do not require a treatment, storage, or disposal permit. Consequently, we submit that, for this additional reason, RCRA was not violated when the University filed its amended Part A permit application, inasmuch as the four chemicals in question did not need to be listed at all on the amended Part A permit application.

We have also researched the definition of "facility", in response to your concern that the University's wastes are generated at several locations on campus. The case law establishes that the term "facility" is not limited to portions of property on which units for managing hazardous wastes are located, but rather extends to all contiguous property under the control of the owner. United Technologies v. USEPA, 821 F.2d 714, 721-23 (D.C. Circuit 1987); Inland Steel Co. v. EPA, 901 F.2d 1419, 1421 (7th Cir. 1990). That is the case here, since the campus is contiguous property under the control of the University. Furthermore, the EPA currently treats the University as one facility, as it operates under one permit.

Mary Fulgham, Esq.
December 7, 1992
Page 3

As stated above, we are interested in continuing our discussions towards a resolution of the Complaint. I hope the information provided here moves us in that direction. I look forward to your response.

Sincerely,


Robert L. Graham

CAP21207.LET-358:lcp

Enclosure

cc: Ms. Juana Rojo
Ms. Barbara Russell

<u>DATE SHIPPED</u>	<u># DRUMS</u>	<u>WASTE CODE</u>
8/3/90	11	F003
8/30/90	1	F003
9/21/90	4	F003
10/5/90	1	F003
10/23/90	16	F002, F003, F005
11/6/90	5	F003
12/10/90	2	F003
12/18/90	3	F003
1/17/91	2	F003
3/5/91	10	F002, F003, F005
3/7/91	2	F003
3/15/91	3	F003
6/13/91	3	F002, F003, F005, D001
8/6/91	11	F002, F003, F005, D001
8/15/91	14	F002, F003, F005, D001, D018, D038, D022, D035
9/26/92	5	F003
11/6/91	3	F002, F003, F005, D001
11/21/91	2	F002, F003, F005, D001
2/7/92	3	F002, F003, F005, D001
3/26/92	7	F002, F003, F005, D001
5/19/92	9	F002, F003, F005, D001
6/30/92	22	F002, F003, F005, D001
8/3/92	3	F002, F003, F005, D001
9/14/92	15	F002, F003, F005, D001
10/29/92	17	F002, F003, F005, D001

ILD 005 421 136

HR-8J

SEP 10 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur Sussman
Registered Agent for
The University of Chicago
5801 South Ellis Avenue
Chicago, Illinois 60637

Re: Complaint, Findings of Violation
and Compliance Order
EPA I.D. No.: ILD 005 421 136

Dear Mr. Sussman:

V-W- 024 - '92

Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by your facility of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Section 6901 et seq., based on information in our files about your facility located at 5801 South Ellis Avenue, Chicago, Illinois. The Complaint states the reasons for such determination. In essence the Respondent, the University of Chicago, failed to submit on a timely basis an amended Part A application with the United States Environmental Protection Agency (U.S. EPA) and was therefore storing hazardous waste without authorization to do so. This Complaint is issued pursuant to Section 3008 of RCRA, 42 U.S.C. Section 6928. Accompanying this Complaint is a Notice of Opportunity for Hearing.

Should you desire to contest the Complaint, a written request for a hearing is required to be filed with the Regional Hearing Clerk, United States Environmental Protection Agency, 77 W. Jackson Blvd., Chicago, Illinois 60604-3590, within thirty (30) days from receipt of this Complaint. A copy of your hearing request should also be sent to Eileen L. Furey, Assistant Regional Counsel, Office of Regional Counsel (CS-3T), U.S. EPA, at the above address.

Regardless of whether you choose to request a hearing within the thirty (30) day time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement, please contact Barbara Russell, U.S. EPA, Region V, RCRA Enforcement Branch (HRE-8J), 77 W. Jackson Blvd., Chicago, Illinois 60604-3590, (312) 353-7922.

Sincerely,

ORIGINAL SIGNED BY
NORMAN NIEDERGANG

Norman R. Niedergang, Acting Associate
Division Director
Office of RCRA
Waste Management Division

Enclosure

cc: William Child, IEPA
William Radlinski, IEPA
Glen Savage, IEPA

bcc: Regional Hearing Clerk (MF-10)
Anita Perry, Office of RCRA (HRE-8J)
Robert Small, OWPE (OS-520)
IL Permit Section (HRP-8J)

B.RUSSELL:ev:08/04/92:DISK #:FILENAME:complain.uc

827 (cc) 8/5/92

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
8/4/92	RL				PRD B-5-92		8-10-92	8/9/92	

ap 8/6/92



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HR-8J

SEP 10 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur Sussman
Registered Agent for
The University of Chicago
5801 South Ellis Avenue
Chicago, Illinois 60637

Re: Complaint, Findings of Violation
and Compliance Order
EPA I.D. No.: ILD 005 421 136/

Dear Mr. Sussman:

V-W- 024 - '92


Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by your facility of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Section 6901 et seq., based on information in our files about your facility located at 5801 South Ellis Avenue, Chicago, Illinois. The Complaint states the reasons for such determination. In essence the Respondent, the University of Chicago, failed to submit on a timely basis an amended Part A application with the United States Environmental Protection Agency (U.S. EPA) and was therefore storing hazardous waste without authorization to do so. This Complaint is issued pursuant to Section 3008 of RCRA, 42 U.S.C. Section 6928. Accompanying this Complaint is a Notice of Opportunity for Hearing.

Should you desire to contest the Complaint, a written request for a hearing is required to be filed with the Regional Hearing Clerk, United States Environmental Protection Agency, 77 W. Jackson Blvd., Chicago, Illinois 60604-3590, within thirty (30) days from receipt of this Complaint. A copy of your hearing request should also be sent to Eileen L. Furey, Assistant Regional Counsel, Office of Regional Counsel (CS-3T), U.S. EPA, at the above address.

Regardless of whether you choose to request a hearing within the thirty (30) day time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement, please contact Barbara Russell, U.S. EPA, Region V, RCRA Enforcement Branch (HRE-8J), 77 W. Jackson Blvd., Chicago, Illinois 60604-3590, (312) 353-7922.

Sincerely,


Norman R. Niedergang, Acting Associate
Division Director
Office of RCRA
Waste Management Division

Enclosure

cc: William Child, IEPA
William Radlinski, IEPA
Glen Savage, IEPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V



IN THE MATTER OF:

THE UNIVERSITY OF CHICAGO
5801 SOUTH ELLIS AVENUE
CHICAGO, ILLINOIS 60637

EPA I.D. NO. ILD 005 421 136

DOCKET NO.

V-W- 024 - '92

COMPLAINT, FINDINGS OF
VIOLATION AND COMPLIANCE ORDER

COMPLAINT

This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. § 6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. Part 22. The Complainant is the Associate Director, Office of RCRA, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is The University of Chicago, 5801 South Ellis Avenue, Chicago, Illinois 60637.

This Complaint is based on information contained in the U.S. EPA files.

Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a)(1), and based on the information cited above, it has been determined that The University of Chicago has violated Subtitle C of RCRA, Section 3005(e), 42 U.S.C. § 6925 and 40 CFR 270.72(a)(1).

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA, 42 U.S.C. §§ 6912(a)(1), 6926(b),

and 6928 respectively. U.S. EPA has promulgated regulations codified at 40 CFR Parts 260 through 271 governing generators and transporters of hazardous wastes and facilities that treat, store and dispose of hazardous waste. Specifically, U.S. EPA has authority in matters related to the toxicity characteristic (TC) rule contained in 40 CFR Part 261.

Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), U.S. EPA must implement any new requirements promulgated pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA) within a state until such time as that state is authorized to carry out the new requirements. The TC rule was promulgated pursuant to HSWA, Sections 3001(g) and (h) of RCRA and became effective on September 25, 1990. The State of Illinois does not yet have authorization to implement the TC rule. This complaint, accordingly, seeks to enforce federal regulations. Notice to the State of Illinois was issued on September 26, 1991.

FINDINGS OF VIOLATION

1. Respondent, the University of Chicago is a person, as defined by Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), who owns and operates a facility at 5801 South Ellis Avenue, Chicago, Illinois 60637 that generates and stores hazardous waste. Respondent is an Illinois corporation whose registered agent is Arthur Sussman, 5801 South Ellis Avenue, Chicago, Illinois 60637.
2. Section 3005(a) of RCRA requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage or disposal facility to obtain a RCRA permit. The regulations published by U.S. EPA in fulfillment of Section 3005(a)'s mandate are

codified at 40 CFR Parts 270. When published, these regulations provided, inter alia, that persons who treated, stored or disposed of listed hazardous waste were required to submit Part A of the permit application no later than November 19, 1980. See 40 CFR 270.10(e).

3. Section 3005(e) of RCRA provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition on the permit application provided that: (1) the facility was in existence on November 19, 1980, or on the effective date of regulatory changes that render a facility subject to permit requirements; (2) the requirements of Section 3010(a) of RCRA concerning notification of hazardous waste activity have been complied with; and (3) an application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.

4. On November 19, 1980, Respondent filed Part A of the permit application with U.S. EPA pursuant to Section 3005 of RCRA. On September 25, 1990, Respondent was operating under interim status with regard to those wastes listed in Respondent's permit application.

5. On March 29, 1990, U.S. EPA promulgated the HSWA-mandated TC rule to replace the Extraction Procedure (EP) Toxicity characteristic test for the identification of hazardous waste. The TC rule added twenty-five (25) new organic constituents to the original fourteen (14) regulated EP constituents. Four of the new constituents were benzene, carbon tetrachloride, chloroform

and trichloroethylene. These wastes have been identified and listed as hazardous wastes under Section 3001 of RCRA (U.S. EPA Hazardous Waste Nos. D018, D019, D022 and D040).

6. On or before September 25, 1990, Respondent was generating and storing hazardous wastes which exhibit the toxicity characteristics for benzene, carbon tetrachloride, chloroform and trichloroethylene.

7. Under the TC rule, facilities operating under interim status and handling newly-regulated TC waste were required to submit an amended Part A application on or before September 25, 1990.

8. Respondent failed to submit to U.S. EPA an amended Part A permit application reflecting the new waste codes for benzene, carbon tetrachloride, chloroform and trichloroethylene (D018, D019, D022 and D040) by September 25, 1990.

9. Respondent submitted an amended Part A permit application reflecting such waste codes on November 30, 1990.

10. U.S. EPA issued Respondent a permit to operate a hazardous waste storage facility for, inter alia, the storage of hazardous wastes including D018, D019, D022, and D040 on July 15, 1991.

COMPLIANCE ORDER

Respondent having been determined to be in violation of the above-cited rules and regulations, the following Compliance Order is entered pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928:

A. Respondent shall maintain compliance with all aspects of the permit issued to it by U.S. EPA on July 15, 1991.

B. Respondent shall pay any penalty assessed against it as a result of its failure to submit on a timely basis an amended Part A permit application.

C. Respondent shall notify U.S. EPA in writing within (15) fifteen days upon achieving compliance with this Order or any part thereof. This notification shall be submitted to the U.S. EPA, Region V, Waste Management Division, 77 W. Jackson Blvd., Chicago, IL 60604-3590. Attn: Barbara Russell, RCRA Enforcement Branch, HRE-8J.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be sent to Scott Phillips, Senior Attorney, Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62706.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In light of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of fifty-three

thousand and ten dollars (\$53,010.00) against the Respondent, The University of Chicago, pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C.

§ 6928. Attachment 1 of the Complaint provides a detailed summary of the proposed civil penalty. Payment shall be made by certified or cashier's check made payable to the Treasurer of the United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. The facility name and docket number shall be provided with such payment. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (MF-10J) and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (CS-3T), U.S. EPA, 77 West Jackson Blvd., Chicago, Illinois 60604-3590.

Failure to comply with any requirement of the Order shall subject the above-named Respondent to liability for a civil penalty of up to twenty-five thousand dollars (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed penalty. Unless Respondent has filed an Answer not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator, Respondent must file a written Answer to this Complaint with the Regional Hearing Clerk, Planning and Management Division, (MF-10J) U.S. EPA Region V, 77 W. Jackson Blvd., Chicago, Illinois 60604-3590, within thirty (30) days of receipt of this notice. A copy of Respondent's Answer and any subsequent documents filed in this action should be sent to Eileen L. Furey, Assistant Regional Counsel (CS-3T) at the same address. Failure to answer within thirty (30) days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of the penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §§ 3701 et seq.

Respondent's Answer should clearly and directly admit, deny or explain each of the factual allegations of which Respondent has knowledge. The Answer should contain: (1) a definite statement of the facts which constitute the grounds of defense; and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

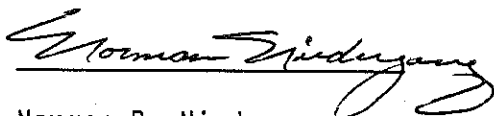
SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business.

Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty (30) day time limit for responding to this Compliant or the thirty (30) day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Barbara Russell, RCRA Enforcement Branch (HRE-8J), at the address cited above, or by calling her at (312) 353-7922.

Dated this 10th day of Sep., 1992.



Norman R. Niedergang
Acting Associate Director, Office of RCRA
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

Sam Wang, Ph.D
Facility Contact
The University of Chicago
5801 South Ellis Avenue
Chicago, Illinois 60637

and

Arthur Sussman
Registered Agent
The University of Chicago
5801 South Ellis Avenue
Chicago, Illinois 60637

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said persons' last known addresses to the subscriber.

Dated this 10th day of September, 1992.

Anita Perry
Secretary, Office of RCRA
U.S. EPA, Region V

ATTACHMENT 1
PENALTY SUMMARY SHEET

NATURE OF VIOLATION	CITATION OF REGULATION OR LAW	GRAVITY- BASED PENALTY	MULTI-DAY PENALTY AMOUNT	ADJUST- MENTS (+/-)	ECONOMIC BENEFIT	TOTAL PENALTY
The Respondent submitted an Amended Part A on November 30, 1990, rather than by the September 25, 1990, deadline--resulting in a multi-day factor of 59	270.70(a)(1)	\$8,750	\$ 850	*-\$5,890	Negl.	\$53,010

Negl. = Economic Benefit Adjustment was calculated but determined to be less than \$2,500 (Negligible)

N/A = Not Applicable

* = 10% decrease for good faith

MEMORANDUM

DATE: 11/22/91
SUBJECT: University of Chicago Non-notifier Complaint

FROM: Mary L. Fulghum, ORC

TO: Barbara J. Russel, RCRA Enforcement

I talked to Kathie Stein, OE RCRA Enforcement counsel, during her visit to Region 5 yesterday. She confirmed that HQ had not resolved the question of whether late notifiers who t,s,d newly identified waste in previously regulated units get interim status when they voluntarily comply or at some other time USEPA determines appropriate. There's some question as to the difference in Congressional intent between the HSWA amendments and the TC rule, non-notifiers and late notifiers. Also, apparently, HQ did not finalize the penalty policy today. Jon Silberman, the HQ penalty guru is sworn to call me Monday, Nov. 25th. Keep in touch!

11/25 — HQ still has not resolved
i.s. issue.

MEMORANDUM

DATE: 11/14/91
SUBJECT: University of Chicago Non-notifier Complaint
FROM: Mary L. Fulghum, ORC
TO: Barbara J. Russel, RCRA Enforcement

*Barbara -
I wrote this
late last
week but
don't remember
mailing it to you,
so I sent it to
you just
in case
I didn't.
MA*

Thanks for your response to my memo of 10/31/91. As per our phone conversation today, I am awaiting headquarters and DOJ's decision regarding the interpretation of 270.72 as it applies to interim status facilities that late-notified new tc wastes. Ira Feldman called me back this afternoon and explained that there is a difference of opinion between OGC and OE whether or not a late but voluntary notifier attains interim status at the date of notification. DOJ has not yet weighed in on the issue. Ira Feldman believes that HQ/DOJ must decide by next Friday if they expect to meet the no-notifier initiative deadlines. He'll call and fax the guidance as soon as it is available. If it's not available before the meeting planned for Monday, November 25, do you still want to meet?

Also, I should mention that John Silverman, the OE penalty guru suggested that because the facility was but 59 days late and voluntarily notified, we should use the bottom of the cell to calculate the penalty. I fully agree. Also, Dave Nelson of OE, believed that the extent of deviation component could be reduced to moderate. (Silverman disagrees.) I would tend to agree with Nelson because the new tc waste was managed in a previously regulated unit but it's probably best to wait until headquarters and DOJ decide how to treat interim status facilities that late-notified new tc wastes.

OCT 30 1991

MEMORANDUM

SUBJECT: University of Chicago Late Notifier Complaint

FROM: Mary L. Fulghum, ORC

TO: Barbara J. Russel, RCRA Enforcement

I have reviewed the U of C complaint but before I can make my final comments I need some additional information from you and possibly headquarters. Also, I would like to apologize for the delay in providing you written response. Last week I took sick leave for two and a half days and I am trying to catch up with the backlog.

First, I need a penalty computation worksheet and narrative explanation. The complaint file included a summary but not the worksheet or explanation.

Second, as a related in a voice mail message, I need to confirm that:

- a) the newly-identified TC wastes were not the same constituents exhibited by EP;
- b) the generator, U of C, was not simply handling the newly-identified TC wastes, but were storing for more than 90 days or disposing of the waste;
- c) were the newly-identified TC wastes managed in a unit that was already regulated or were the wastes being managed in a previously unregulated unit?

Also, I need to confirm that none of the wastes were being managed in a land disposal unit.

Finally, headquarters is coming out with late and non-notifier penalty guidance supposedly "any day now." Well, it was "any day now" until I related this case to them. Apparently, they had not considered LOIS for a late-notifier where the late notifier had interim status. I am expecting to hear from Ira Feldman about this question "any day now!"



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: 0316410001 -- Cook County
University of Chicago
ILD005421136
Compliance File

October 27, 1989

University of Chicago
Attn: Sam Wang
5735 South Ellis Avenue
Chicago, Illinois 60637

Dear Mr. Wang:

The Agency is in receipt of your September 25, 1989 response(s) to our April 26, 1989 Pre-Enforcement Conference. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 722.111 is now considered resolved.

If you have any questions, please contact Carol Graszer at 312/345-9780.

Sincerely,

Angela Aye Tin

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:BW:rd3696k/55

cc: Division File
Maywood Region
Carol Graszer
Brian White



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: 0316410001 -- Cook County
University of Chicago
ILD005421136
Compliance File

July 27, 1989

University of Chicago
ATTN: Sam Wang
5735 South Ellis Avenue
Chicago, Illinois 60637

Dear Mr. Wang:

The Agency is in receipt of your June 26, 1989 response(s) to our April 26, 1989 Pre-Enforcement Conference. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 725.113(b) is now considered resolved.

If you have any questions, please contact Carol A. Graszer at 312/345-9780.

Sincerely,

A handwritten signature in cursive script, reading "Angela Aye Tin".

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:BW:dls/2496k,92

cc: Division File
Maywood Region
Carol Graszer
Brian White



217/782-6761

Refer to: 0316410001 -- Cook County
University of Chicago
ILD005421136
Compliance File

July 7, 1989

University of Chicago
ATTN: Sam Wang
5735 South Ellis Avenue
Chicago, Illinois 60637

Dear Mr. Wang:

The Agency is in receipt of your May 22, 1989 and June 20, 1989 response(s) to our April 26, 1989 Pre-Enforcement Conference. Your response(s) have been reviewed and the apparent violation(s) of Section(s) 725.137, 725.152(a), 725.152(c), 725.153, and 725.115(d) are now considered resolved.

If you have any questions, please contact Carol Graszer at 312/345-9780.

Sincerely,

Angela Aye Tin

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:BW:lab/2328k, 31

cc: Division File
Maywood Region
Carol Graszer
Brian White



217/782-6761

Refer to: 0316410001 -- Cook County
University of Chicago
ILD005421136
Compliance File

June 8, 1989

University of Chicago
Attn: Sam Wang
5735 South Ellis Avenue
Chicago, Illinois 60637

Dear Mr. Wang:

The Agency is in receipt of your ~~April 26, 1989~~ and May ¹², 1989 response(s) to our March 29, 1989 Pre-Enforcement Conference Letter. Your response(s) have been reviewed and the apparent violation(s) of Section(s) 725.115(b) and 725.175 are now considered resolved.

If you have any questions, please contact Carol A. Graszer at 312/345-9780.

Sincerely,

Angela Aye Tin

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:BW:kja:2030k/95

cc: Division File
Maywood Region
Carol Graszer
Brian White

01 JUN 1989

5HR-12

Mr. Sam Wang
Laboratory Safety Officer
University of Chicago
5735 South Ellis Avenue
Chicago, Illinois 60637

Re: University of Chicago
ILD 005 421 136

Dear Mr. Wang:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on May 19, 1989. The stated actions appear to adequately address the land disposal restrictions deficiencies outlined in our April 21, 1989, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,


Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS
Harry Chappel, IEPA, CMS

5HR-12:B. RUSSELL:or:05/25/89:disk #2:PC FILENAME:SWANG

0. R. 5/26/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	BL 6/1/89	FRN acting 6-1-89	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HR-12

01 JUN 1989

Mr. Sam Wang
Laboratory Safety Officer
University of Chicago
5735 South Ellis Avenue
Chicago, Illinois 60637

Re: University of Chicago
ILD 005 421 136

Dear Mr. Wang:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on May 19, 1989. The stated actions appear to adequately address the land disposal restrictions deficiencies outlined in our April 21, 1989, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Fred R. Norling

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS
Harry Chappel, IEPA, CMS

THE UNIVERSITY OF CHICAGO

CHICAGO • ILLINOIS 60637

DEPARTMENT OF CHEMISTRY

5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY • GEORGE HERBERT JONES LABORATORY
SEARLE CHEMISTRY LABORATORY

May 19, 1989

Mr. Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Dimock:

We have received your letter of April 21, 1989, indicating Land Disposal Restriction violations with regard to the handling procedure of our restricted chemical waste.

With the help of the inspection report and to the best of our knowledge, we have prepared the attached documentation in which we have addressed each item of the eight deficiencies mentioned in your letter. We have tried our best in the past to comply with the applicable RCRA waste management requirements and we will take every measure in the future to assure compliance with the changing regulations.

Thank you for your attention to this matter. Should you have any questions, please contact me either in writing or by phone (312)702-7051.

Sincerely yours,



Sam Wang
Laboratory Safety Officer
University of Chicago

Enclosure

RECEIVED
MAY 20 1989
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

1. Determination of the appropriate treatability group of the waste:

A. F-solvent (F001-F005) waste that we have generated in various concentrations in bulk liquid are listed below. They all belong to the treatability group of "all other spent solvent wastes".

- 1) Xylene
- 2) Toluene
- 3) Ethylene Glycol
- 4) Formaldehyde
- 5) Methylene Chloride
- 6) Carbon Tetrachloride
- 7) Acetone
- 8) Benzene
- 9) Hexane
- 10) Ether
- 11) Pump Oil

B. First Third waste that we have generated are listed below with their waste codes. They all belong to the treatability group of "nonwastewater".

Waste Code

- | | | |
|-----|------|----------------------|
| 1) | P030 | Soluble Cyanide |
| 2) | P050 | Endosulfan |
| 3) | P087 | Osmium Tetraoxide |
| 4) | P089 | Parathion |
| 5) | U009 | Acrylonitrile |
| 6) | U012 | Aniline |
| 7) | U019 | Benzene |
| 8) | U031 | n-Butanol |
| 9) | U044 | Chloroform |
| 10) | U077 | Dichloroethane |
| 11) | U108 | Dioxane |
| 12) | U122 | Formaldehyde |
| 13) | U154 | Methanol |
| 14) | U159 | Methylethyl Ketone |
| 15) | U188 | Phenol |
| 16) | U211 | Carbon Tetrachloride |
| 17) | U219 | Thiourea |
| 18) | U220 | Toluene |
| 19) | U228 | Trichloroethylene |

2. Determination of whether the waste exceeds treatment standards:

A. F-solvent (F001-F005) waste

We have determined that the F-solvent waste exceeds

treatment standards based on the knowledge of waste. A waste analysis sheet (attachment 1) on shipping solvent waste to SCA for incineration is enclosed. The composition of each waste stream remains relatively unchanged so that only re-certifications of our waste profile are needed.

B. California waste and First Third waste

We have determined that the waste exceeds treatment standards base on the knowledge of waste. The waste chemicals are unused portions of pure substances in containers (usually less than one pound in capacity) from university's research and teaching laboratories. The names of the chemicals are clearly on the labels of original containers. For more information please see 4. Waste Analysis.

3. Land Disposal Ban Notification:

We have provided notifications with manifests for shipment of F-solvent waste in the past. Please see sample copies enclosed (attachment 2). We will continue to do so in the future.

4. Waste Analysis:

The University generates hundreds of different chemicals in small quantities from research and teaching laboratories. They are mostly unused portions of pure chemicals in original glass bottles with labels bearing the name of the chemical. Such chemicals entering the storage area are sorted and classified according to their compatibilities. Chemicals of different compatibility, i.e., flammable, toxic, water-reactive, and corrosive chemicals, are segregated into different storage rooms. The waste analysis in this case is in essence a compatibility test based upon the knowledge and literature information of the chemical in question. Equally important, a group of other tests are being performed to reassure the test integrity. The test methods are described as follows:

1) Flash-point Test

Flammability of volatile organic liquids (solvents) is determined using a flash-point test. An open cup flash-point test apparatus is used and the ignition temperature of the liquid is noted while heating the liquid.

2) Corrosion Test

The pH of acids and bases is determined using a pH meter

or test papers (e.g., Hydrion paper). if solutions exhibit a pH of less than 2 or greater than 12.5, they are classified as corrosive chemicals.

3) Reactivity Test

The substance is checked for reactivity with water or acidic water. Testing involves adding a small amount of chemical to water or acidified water and observing any reactivity that produces heat, fumes, or gas.

4) Organic-inorganic Test

The test is performed using the chemical principle "like dissolves like". The test is performed by adding the substance to a homogeneous mixture of organic solvents (such as acetone, benzene, ether, alcohol, etc.) and observing the solubility. If the substance dissolves or the solution remains single-phased, it is likely to be an organic compound. In order to test for inorganic compounds, the chemical is added to water to check for solubility.

5) Physical Test

The substance may be characterized by phase, color, viscosity, crystalline form, and boiling point, etc.. This test proves to be very effective in general screening.

5. Maintaining a complete operating record:

An operating log is now in place which records all the activities in the facility on daily basis.

6. Identifying contents and mark dates on chemicals entering storage:

Bottles of chemicals entering storage are already labelled (please see 2.B. and 4. on previous pages). The dates of beginning storage will be marked on bottles or on boxes.

7. & 8. Locating treating facilities and submitting demonstration/certification for greatest environmental benefit:

We have been using the service of SET Environmental, Inc. (450 Sumac Road, Wheeling, Illinois) as our waste contractor since December, 1981. They are the only company that has been doing lab-packing for us, including the First Third waste. Based on our knowledge about the company, we have determined that the company will provide treatment which yields the greatest environmental benefit. If there is a need in the future to acquire more services from other treatment

facilities, we will continue our effort to locate those facilities that are well qualified. Enclosed please find a copy of the Soft Hammer Demonstration/Certification submitted to the Regional Administrator of U.S. EPA in qualifying SET Environmental, Inc. for waste treatment and reduction (attachment 3).

Attachment 1

Waste Analysis Sheet



Waste Management, Inc.
2206132
RECERTIFICATION OF
GENERATOR'S WASTE MATERIAL PROFILE SHEET

RECERTIFIED
WASTE PROFILE SHEET CODE

INC E99721

INSTRUCTIONS: A COPY OF THE COMPLETE GENERATOR'S WASTE MATERIAL PROFILE SHEET WHICH IS BEING RECERTIFIED MUST BE ATTACHED TO THIS RECERTIFICATION FORM. ORDINARILY THE LAST COMPLETE PROFILE SHEET WILL BE ATTACHED TO YOUR CONTRACT. IF YOU HAVE ANY DIFFICULTY LOCATING THE LAST COMPLETE PROFILE SHEET, CONTACT THE PERSON SHOWN BELOW. IN ADDITION WE ASK YOU TO COMPLETE THE REMAINDER OF THIS FORM AND TO HAVE IT SIGNED BY AN AUTHORIZED EMPLOYEE. ANSWERS MUST BE MADE TO ALL QUESTIONS AND MUST BE COMPLETED IN INK. INFORMATION SUPPLIED WILL BE MAINTAINED IN STRICT CONFIDENCE, CONSISTENT WITH FEDERAL REQUIREMENTS.

RETURN THIS FORM AND ATTACHMENTS TO:

SCA Chemical
11700 S. Stony Island
Chicago, IL 60617

PENDING

A GENERAL INFORMATION

GENERATOR NAME: UNIVERSITY OF CHICAGO
TRANSPORTER: MR. FRANK, INC.
FACILITY ADDRESS: 5747 S. ELLIS AVE.
CHICAGO, ILL. 60637
TRANSPORTER PHONE: (312) 596-3377
GENERATOR USEPA I.D. ILD005421136
GENERATOR STATE I.D. 0316410001
TECHNICAL CONTACT: SAM H. WANG
TITLE: LAB SAFETY OFFICER
PHONE: (312) 702-7051
NAME OF WASTE: FLAMMABLE LIQUID MIXTURE, N.C.S.
PROCESS GENERATING WASTE: RESEARCH AND INSTRUCTION

B CHANGES OR ADDITIONS SINCE LAST PROFILE SHEET PREPARATION OR RECERTIFICATION

- HAVE YOU OBTAINED ANY LABORATORY ANALYSIS OF THIS WASTE? ☒ YES ☐ NO (IF YES, PLEASE ATTACH COPIES) (SEE THE LAST PROFILE SHEET)
- HAVE YOU CHANGED THE RAW MATERIALS USED IN THE WASTE-GENERATING PROCESS? ☐ YES ☒ NO
- HAVE YOU CHANGED THE WASTE-GENERATING PROCESS ITSELF? ☐ YES ☒ NO
- ARE YOU AWARE OF ANY FACTS OR CIRCUMSTANCES WHICH HAVE, OR REASONABLY COULD HAVE, ALTERED THE PHYSICAL OR HAZARDOUS CHARACTERISTICS, OR CHEMICAL COMPOSITION OF THE WASTE? ☐ YES ☒ NO
- ARE YOU AWARE OF ANY HUMAN HEALTH EFFECTS OF EXPOSURE TO THE WASTE NOT PREVIOUSLY DESCRIBED? ☐ YES ☒ NO
- IF YOU ANSWERED "YES" TO QUESTIONS 2, 3, 4 OR 5, PLEASE PROVIDE DETAILS BELOW:

Recert off Lease

NO CHANGE

C SPECIFIC CONSTITUENTS

DOES THIS WASTE CONTAIN POLYCHLORINATED BIPHENYLS? ☐ YES ☒ NO
DOES THIS WASTE CONTAIN 2, 3, 7, 8-TCDD? ☐ YES ☒ NO

D SHIPPING INFORMATION

MOD OF SHIPMENT: ☒ BULK LIQUID ☐ BULK SOLID ☐ DRUM (TYPE/SIZE) _____
ANTICIPATED VOLUME: 1000 GALS. _____ CUBIC YDS. _____ OTHER _____
PER: ☒ ONE TIME ☐ WEEK ☐ MONTH ☐ QUARTER ☐ YEAR ☐ _____

RECERTIFICATION. I AM AN EMPLOYEE OF THE GENERATOR AUTHORIZED TO SIGN THIS CERTIFICATION. THE INFORMATION PROVIDED IN THE RECERTIFIED WASTE PROFILE SHEET ATTACHED HERETO, AND THE INFORMATION SUPPLIED ABOVE, ARE COMPLETE, TRUE AND CORRECT.

NAME: SAM H. WANG
TITLE: LAB SAFETY OFFICER
SIGNATURE: Sam H. Wang
DATE: 1/25/88



Waste Management

GENERATOR'S WASTE MATERIAL PROFILE SHEET

APPROVED



WASTE PROFILE SHEET CODE

TSOR 0 E99721

A GENERAL INFORMATION log # 4674 REAPPROVAL 2049-001

GENERATOR NAME: The University of Chicago
TRANSPORTER: Chicago Industrial Waste Haulers
FACILITY ADDRESS: 5735 S. Ellis Avenue
Chicago, IL. 60637
TRANSPORTER PHONE: (312) 597-9500
GENERATOR USEPA I.D. 1110005421136
GENERATOR STATE I.D. 0316410001
TECHNICAL CONTACT: Norman H. Nachtrieb
NAME OF WASTE: Flammable liquid mixture, n.o.s.
PHONE: 312-962-7094
PROCESS GENERATING WASTE: Research and instruction

B PHYSICAL CHARACTERISTICS OF WASTE

COLOR Brown	ODOR <input type="checkbox"/> NONE <input type="checkbox"/> MILD <input checked="" type="checkbox"/> STRONG DESCRIBE aromatic	PHYSICAL STATE @ 70°F <input type="checkbox"/> SOLID <input type="checkbox"/> SEMI-SOLID <input checked="" type="checkbox"/> LIQUID <input type="checkbox"/> POWDER	LAYERS <input type="checkbox"/> MULTILAYERED <input checked="" type="checkbox"/> BI-LAYERED <input type="checkbox"/> SINGLE PHASED	FREE LIQUIDS <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO VOLUME 100 %
PH: <input type="checkbox"/> < 2 <input type="checkbox"/> 7.1-10 <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 2-4 <input type="checkbox"/> 10.1-12.5 <input type="checkbox"/> 4.1-6.9 <input type="checkbox"/> > 12.5 <input type="checkbox"/> 7 <input type="checkbox"/> EXACT 6.0	SPECIFIC GRAVITY <input type="checkbox"/> < .8 <input type="checkbox"/> 1.3-1.4 <input type="checkbox"/> .8-1.0 <input type="checkbox"/> 1.5-1.7 <input type="checkbox"/> 1.1-1.2 <input type="checkbox"/> > 1.7 <input type="checkbox"/> EXACT 0.90	FLASH POINT <input type="checkbox"/> < 70°F <input type="checkbox"/> > 200°F <input type="checkbox"/> 70°F - 100°F <input type="checkbox"/> NO FLASH <input checked="" type="checkbox"/> OPEN CUP <input checked="" type="checkbox"/> 101°F - 139°F <input type="checkbox"/> EXACT <input type="checkbox"/> 140°F - 200°F		

C CHEMICAL COMPOSITION (TOTALS MUST ADD TO 100%)

Xylene-toluene	35 %
Ethylene glycol	15 %
Vacuum pump oil, used	10 %
Formaldehyde, 37% H ₂ O, 67%	20 %
Methylene chloride	5 %
Carbon tetrachloride	3 %
Acetone	3 %
Benzene-aniline	5 %
Hexanes	2 %
Ether	2 %

D METALS

TOTAL (PPM)	EPA EXTRACTION PROCEDURE (mg/L)
ARSENIC (As) < 0.1	SELENIUM (Se) < 0.1
BARIUM (Ba) < 1	SILVER (Ag) < 1
CADMIUM (Cd) < 1	COPPER (Cu) < 1
CHROMIUM (Cr) < 1	NICKEL (Ni) < 1
MERCURY (Hg) < 0.1	ZINC (Zn) < 1
LEAD (Pb) < 1	THALLIUM (Tl) < 1
CHROMIUM-HEX (Cr + 6)	

E OTHER COMPONENTS - TOTAL (PPM)

CYANIDES 0	PCB'S 0
SULFIDES 0	PHENOLICS 100

F SHIPPING INFORMATION

DL 5/18/89
D.O.T. HAZARDOUS MATERIAL? ☒ YES ☐ NO
PROPER SHIPPING NAME: Flammable liquid n.o.s.
HAZARD CLASS: flammable liquid I.D. NO. NA1993 R.Q. 1000#
METHOD OF SHIPMENT: ☒ BULK LIQUID ☐ BULK SOLID
☐ DRUM (TYPE/SIZE)
ANTICIPATED VOLUME: 1000 GALS. CUBIC YARDS
PER: ☐ ONE TIME ☐ WEEK ☐ MONTH
☒ QUARTER ☐ YEAR

G HAZARDOUS CHARACTERISTICS

REACTIVITY: ☒ NONE ☐ PYROPHORIC ☐ SHOCK SENSITIVE
☐ EXPLOSIVE ☐ WATER REACTIVE ☐ OTHER
OTHER HAZARDOUS CHARACTERISTICS:
☒ NONE ☐ RADIOACTIVE ☐ ETIOLOGICAL
☐ PESTICIDE MANUFACTURING WASTE ☐ OTHER
USEPA HAZARDOUS WASTE? ☒ YES ☐ NO
USEPA HAZARDOUS CODE(S) D001 F002 F003 F005
STATE HAZARDOUS WASTE? ☒ YES ☐ NO
STATE CODE(S) D001 F002 F003 F005

H SPECIAL HANDLING INFORMATION

I HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS COMPLETE AND ACCURATE, AND THAT ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

AUTHORIZED SIGNATURE

TITLE

University Laboratory Safety Officer

DATE

AUGUST 6 1985

Attachment 2

Land Disposal Ban Notifications

GENERATOR NOTIFICATION TO TREATMENT STORAGE DISPOSAL (TSD) FACILITY
WHERE RESTRICTED WASTE REQUIRES TREATMENT PRIOR TO LAND DISPOSAL

GENERATOR: Univ of Chgo

MANIFEST NO.: 89-0571

This notification is submitted to Quadrex H.P.S Inc (TSD) in accordance with 40 CFR Section 268.7 (a) (1) effective November 8, 1986. 40 CFR Section 268.7(a) requires the generator to test his waste and develop an extract using the Toxicity Characteristic Leaching Procedure (TCLP), or have knowledge of the waste to determine if it is restricted from land disposal.

EPA Hazardous Waste No. F001, F002, P003, P004, and P005 are "restricted wastes" and banned from land disposal effective November 8, 1986, unless one or more of the following conditions apply: (1) The generator of the solvent waste is small quantity generator, (2) The solvent waste is generated from response action taken under CERCLA or corrective action taken under RCRA, or (3) The solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1% (10,000 ppm) total F001-F005 solvent constituents listed in Table CWCE of Section 268.41.

If a generator determines he is managing a restricted waste and the waste requires treatment prior to land disposal, for each shipment of such waste, the generator must notify the treatment facility in writing of the appropriate treatment standard. This notification must include the information to be provided below.

1. EPA Hazardous Waste Number F003/F005
2. Waste Material Profile No. (If Applicable) N/A
3. Treatment Standard (Check Each Waste on Reverse Side)
4. Waste analysis data, where available (Attached: Yes ☐ No ☒)

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

PLEASE BE SURE TO CHECK THE APPROPRIATE BOX(ES) ON THE REVERSE SIDE BEFORE SIGNING.

Signed: Wm J Wang
(Authorized Representative
of Generator)

Date: 5-1-89
4-31-89

Title: LAB. SAFETY OFFICER

Note: A copy of this Notice must accompany each manifested load as required by

APPENDIX A

CORRESPONDING TREATMENT STANDARD

INSTRUCTIONS TO GENERATOR: For each solvent waste constituent present, in your waste shipment, check the appropriate box after the applicable treatment standard(s). If based upon best knowledge and information, your waste shipment may contain some or all of the solvent constituents listed below, please mark the appropriate box(es) or the box labeled "All of the above" at the bottom."

NOTIFICATION TO TSD FACILITY: The following P001-5 constituents are present in the waste shipment:

FO01:	Solvent Constituent	Treatment Standard (mg/l)		Check (If Yes)
		Wastewaters	All other Wastes	
	Tetrachloroethylene	0.079	0.05	
	Trichloroethylene	0.062	0.091	
	Methylene chloride	0.20	0.96	
	1,1,1-Trichloroethane	1.05	0.41	
	Carbon Tetrachloride	0.05	0.96	
	Chlorinated Fluorocarbons			
	All Of The Above			
FO02:	Tetrachloroethylene	0.079	0.05	
	Trichloroethylene	0.062	0.091	
	Methylene chloride	0.20	0.96	
	1,1,1-Trichloroethane	1.05	0.41	
	Chlorobenzene	.15	.05	
	Trichlorofluoromethane	0.05	0.96	
	1,1,2-Trichloro-1,2,2-Trifluoroethane			
	Ortho-Dichlorobenzene			
FO03:	Xylene	0.05	0.15	
	Acetone	0.05	0.59	
	Ethyl Acetate	0.05	0.75	
	Ethyl Benzene	0.05	0.053	
	Ethyl Ether	0.05	0.75	
	Methyl Isobutyle Ketone	0.05	0.33	
	n-Butyl Alcohol	5.0	5.0	
	Cyclohexanone	0.125	0.75	
	Methanol	0.25	0.75	
	All Of The Above			
FO04:	Cresols and Cresylic Acid	2.02	0.75	
	Nitrobenzene	0.66	0.125	
	All Of The Above			
FO05:	Toluene	1.12	0.33	
	Methyl Ethyl Ketone	0.05	0.75	
	Carbon Disulfide	1.05	1.81	
	Isobutanol	5.0	5.0	
	Pyridine	1.12	0.33	
	All Of The Above			

SPENT SOLVENT WASTE

LAND DISPOSAL BAN NOTIFICATION FORM

Generator Name: UNIVERSITY OF CHICAGO

CWMI Profile Number: E 99721

EPA ID Number: ILD 005421136

Manifest Number: IL 1752876

This form is submitted to SCA - CHICAGO INCINERATOR in accordance with regulations published by EPA at 40 CFR Part 268, which govern the land disposal of restricted hazardous wastes. The hazardous waste identified above has been listed as a restricted waste by EPA under the Part 268 regulations. In accordance with the waste analysis and recordkeeping requirements set forth at 40 CFR 268.7, I have marked the appropriate box below to indicate how my waste must be managed to conform to the regulations. (See instructions on reverse side for marking appropriate box).

Restricted Waste Requires Treatment

- ☒ 1. The waste identified above must be treated to the appropriate standard identified in 40 CFR 268 Subpart D.

Restricted Waste Treated to Performance Standard

- ☐ 2. The waste identified above has been treated, the treatment residues have been tested in accordance with the facility WAP, and the residues have been found to meet the performance standards specified in 40 CFR Subpart D. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to achieve the performance levels specified in 40 CFR Part 268 Subpart D without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."

Restricted Waste Subject to Variance

- ☐ 3. The waste identified above is subject to a case-by-case extension under 40 CFR 268.5, a petition under 40 CFR 268.6, a nationwide variance under Subpart C, or another exemption from the November 8, 1986 land disposal prohibition date.

I hereby certify that all material submitted in this and associated documents is complete and accurate to the best of my knowledge and information:

Signature Wing Wang

LAB SAFETY OFFICER

Title

7-21-88

Date

Instructions for Completing Front Side of Form

Mark Box 1 if you are the initial generator of a spent solvent waste specified in 40 CFR 261.31 as EPA Hazardous Waste Nos. F001, F002, F003, F004, and F005, and your waste is ineligible for a nationwide variance or other exemption from the November 8, 1986 prohibition date. (See below).

If Box 1 is marked, your solvent waste is restricted and must be treated to the standards set forth in the box below prior to land disposal. For each solvent waste present in your waste shipment, check the appropriate box in front of the applicable treatment standard(s). If based upon best knowledge and information, your waste shipment may contain some or all of the constituents listed below, please mark the appropriate boxes or the box labeled "All of the above" at the bottom.

Constituent Concentration in Waste Extract (CCWE) Table

Solvent Constituent	Treatment Standard (mg/l)	
	Wastewaters	All Other Wastes
Acetone	0.05	✓ 0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	0.05	✓ 0.96
Chlorobenzene	0.15	0.05
Cresols	2.82	0.75
Cresylic acid	2.82	0.75
Cyclohexanone	0.125	0.75
1,2-Dichlorobenzene	0.65	0.125
Ethyl acetate	0.05	✓ 0.75
Ethyl benzene	0.05	0.053
Ethyl ether	0.05	✓ 0.75
Isobutanol	5.0	5.0
Methanol	0.25	✓ 0.75
Methylene chloride	0.20	✓ 0.96
Methylene chloride (from pharmaceutical industry)	12.7	0.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	✓ 0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	✓ 0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	✓ 0.15
All of the above		

Mark Box 2 if you are the owner/operator of a treatment facility that has treated restricted solvent waste to the treatment standards set out in the above table.

Mark Box 3 and the appropriate box below to indicate that your waste is not restricted from land disposal until November 8, 1988:

1. You are a small quantity generator of 100-1000 kilograms of hazardous waste per month; or
2. The solvent waste is generated from a response action taken under sections 104 or 106 of CERCLA or corrective action taken under sections 3004(u) or 3008(h) of RCRA; or
3. You are the initial generator of a solvent waste that is a solvent water mixture, solvent-containing sludge or solid, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001-F005 solvent constituents listed in the above table.
4. The solvent waste is subject to a case-by-case extension or no-migration petition.
5. Your waste is a residue generated from the treatment of only spent solvent wastes identified in one of the above four categories. (e.g., you are a solvent recycler that has treated only small quantity generator waste, or you are a wastewater treatment plant that has treated only wastewater containing less than 1% total F001-F005 solvent constituents.)

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

Generator Name: UNIVERSITY OF CHICAGO
CHICAGO, ILL.

CWMI Profile Number: E99721

EPA ID Number: ILD 005421136

Manifest Number: IL 1752876

This form is submitted to SCA - CHICAGO INCINERATOR in accordance with regulations published by EPA at 40 CFR Part 268, which govern the land disposal of certain untreated hazardous wastes. The hazardous waste identified above is one of the "California List" wastes under EPA's Part 268 regulations. In accordance with the waste analysis and recordkeeping requirements specified by EPA at 40 CFR 268.7, I have marked the appropriate box below which indicates how my waste must be managed to conform to the land disposal ban regulations. (See instructions on reverse side for marking appropriate box.)

Restricted Waste Requires Treatment

- (1) ☒ I am the initial generator of an untreated waste identified above which must be treated to the appropriate treatment standard set forth in 40 CFR 268 Subpart D, or where no treatment standard exists for the California List waste, the waste must be treated to the levels specified under 40 CFR 268.32.

Restricted Waste Treated to Performance Standards

- (2) ☐ The waste identified above has been treated in compliance with the applicable performance standards specified in 40 CFR 268 Subpart D and/or the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

Restricted Waste Subject to Variance

- (3) ☐ The waste identified above is subject to a case-by-case extension under 40 CFR 268.5, a no-migration petition under 40 CFR 268.6, a nationwide variance under Subpart C, or is soil or debris generated from a response action taken under CERCLA or corrective action taken under RCRA.

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Chi-jia Wang
Signature

LAB SAFETY OFFICER
Title

7-21-88
Date

- Chemical Waste Management, Inc. -

Instructions for Completing Front Side of Form

The California List represents the second phase of the federal land disposal ban which became effective July 8, 1987. A waste is subject to the California List prohibitions if it meets each of the following four criteria:

- (1) the waste must contain a constituent specified in the California List provisions or have a pH less than or equal to two; and
- (2) the physical form of the waste must be liquid (except for HOCs); and
- (3) the waste containing the California List constituent must be listed or identified as hazardous under RCRA section 3001; and
- (4) the waste must contain a concentration of one or more of the California List constituents at or above the levels specified in section 3004(d).

Any generator or treater that manages a California List waste must accompany the shipment off-site with a notification/certification by marking one of the three boxes on the reverse side of this form.

MARK BOX 1 if you are the initial generator of a liquid hazardous waste containing one (or more) of the following substances in the specified concentrations:

- (1) Free cyanides at concentrations greater than or equal to 1000 mg/l.
- (2) One (or more) of these metals (or elements) at concentrations greater than or equal to those specified below:
 - a. Arsenic and/or compounds (as As) 500 mg/l;
 - b. Cadmium and/or compounds (as Cd) 100 mg/l;
 - c. Chromium VI and/or compounds (as CrVI) 500 mg/l;
 - d. Lead and/or compounds (as Pb) 500 mg/l;
 - e. Mercury and/or compounds (as Hg) 20 mg/l;
 - f. Nickel and/or compounds (as Ni) 134 mg/l;
 - g. Selenium and/or compounds (as Se) 100 mg/l;
 - h. Thallium and/or compounds (as TH) 130 mg/l.
- (3) Liquid hazardous wastes having a pH less than or equal to two (2.0).
- (4) Liquid hazardous wastewaters that are primarily water and contain halogenated organic compounds (HOCs) in total concentration greater than or equal to 1,000 mg/l and less than 10,000 mg/l.
- (5) Polychlorinated biphenyls (PCBs) at concentrations greater than or equal to 50 ppm. (Remember the waste must also be a RCRA hazardous waste).

MARK BOX 2 if you have treated one (or more) of the above California List wastes in compliance with the applicable performance standards specified in 40 CFR 268 Subpart D or the applicable prohibitions set forth in 40 CFR 268.32. This means that (1) for liquid hazardous wastes containing free cyanides or metals at the concentration levels specified above, you have treated the waste below those specified concentration levels, or rendered the waste non-liquid per the paint filter test; or (2) for liquid corrosive wastes, you have either treated the waste above a pH of two, or rendered the waste non-liquid per the paint filter test; or (3) for wastewaters containing HOCs in total concentrations greater than or equal to 1,000 mg/l and less than 10,000 mg/l, you have treated the waste below 1,000 mg/l; or (4) for liquid hazardous wastes containing PCBs at concentrations greater than or equal to 50 ppm but less than 500 ppm, you have incinerated the waste in accordance with 40 CFR 761.70 or burned it in a high efficiency boiler in accordance with 40 CFR 761.60; or (5) for liquid hazardous waste containing PCBs at concentrations greater than or equal to 500 ppm, you have incinerated the waste in accordance with 40 CFR 761.70. All liquid hazardous wastes containing PCBs over 50 ppm must also be incinerated in accordance with Parts 264, 265 and 266. The certification on the reverse side must be given by the treater.

MARK BOX 3 if your waste is one of the following:

- (A) Liquid hazardous wastes that contain HOCs in total concentrations greater than or equal to 1,000 mg/l but are not wastewaters.
- (B) Non-liquid hazardous wastes containing HOCs in total concentrations greater than or equal to 1,000 mg/kg.

Also mark Box 3 if the California List waste is soil or debris generated from a response action taken under sections 104 or 106 of CERCLA or corrective action taken under sections 3004 or 3008 of RCRA. This waste is not banned from land disposal until November 8, 1988. Box 3 should also be marked if your waste is subject to a case-by-case extension or no-migration petition.

NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL

MATERIAL TYPE: ☒ SPENT SOLVENT ☒ "CALIFORNIA LIST" WASTE

GENERATOR'S NAME UNIVERSITY of Chicago SITE ADDRESS 5735 SOUTH ELIS

Chicago IL 60637

GEN. EPA. ID. NUMBER IL D1005142111316

MANIFEST NO. TX 00496760 Line No. ☐ 11a ☐ 11b ☐ 11c ☐ 11d

T1 AUTH. NO. LP WS 8806200 HAZARDOUS WASTE NUMBER(S) 7004 10002

I am supplying this notice and certification to Treatment One in accordance with the requirements of regulations at 40 CFR 268.7. I have determined that the material described above either contains spent solvents or is a "California list" waste as defined in 40 CFR 268. I have indicated above the type of material which is covered by this notification. I have also indicated below the appropriate management required to comply with the prohibitions on land disposal for this material.

RESTRICTED WASTE REQUIRING TREATMENT

- I. ☒ I am the generator of an untreated waste restricted from land disposal under 40 CFR 268. This waste, identified above, may not be land disposed unless it is first treated to the appropriate treatment standard(s), as indicated below. I have attached available waste analysis data ☐ YES ☒ NO

RESTRICTED WASTES NOT REQUIRING FURTHER TREATMENT

- II. ☐ The waste identified above has been treated in compliance with the applicable treatment standards specified in 40 CFR 268 Subpart D and/or the applicable prohibitions set forth in 40 CFR 268.32. I have indicated the appropriate treatment standards or applicable prohibitions below.

"I Certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

SIGNATURE _____ TITLE _____ DATE _____

I have attached available waste analysis data ☐ YES ☐ NO

RESTRICTED WASTE SUBJECT TO EXTENSION, PETITION, OR VARIANCE

- III. ☐ The waste material identified above is subject to a case-by-case extension under 268.5, a petition under 268.6, or a nationwide variance under Part 268 Subpart C.

The following materials are contained in the waste and either require treatment to the specified levels or have been treated to the specified level depending on whether Box I, or Box II was checked above.

SPENT SOLVENTS

"CALIFORNIA LIST" WASTES

Material	Treatment Standard (Mg/l) Wastewater	Other
— Acetone	0.05	0.59
— n-Butyl Alcohol	5.0	5.0
— Carbon Disulfide	1.05	4.81
— Carbon Tetrachloride	.05	.96
— Chlorobenzene	.15	.05
<input checked="" type="checkbox"/> Cresols (and cresylic acid)	2.82	.75
— Cyclohexanone	.125	.75
— 1, 2 dichlorobenzene	.65	.125
— Ethyl Acetate	.05	.75
— Ethyl Benzene	.05	.053
— Ethyl Ether	.05	.75
— Isobutanol	5.0	5.0
— Methanol	.25	.75
— Methylene Chloride	.20	.96
— Methylene Chloride (Pharmaceutical Industry)	12.7	.96
— Methyl ethyl ketone	.05	.75
— Methyl isobutyl ketone	.05	.33
— Nitrobenzene	.66	.125
— Pyridine	1.12	.33
— Tetrachlorethylene	.079	.05
— Toluene	1.12	.33
— 1, 1, 1-Trichloroethane	1.05	.41
— 1, 2, 2 Trichloro-		
— 1, 2, 2-Trifluoroethane	1.05	.96
— Trichloroethylene	.062	.091
— Trichlorofluoromethane	.05	.96
— Xylene	.05	.15

- ☒ Liquid Hazardous Waste having a pH less than or equal to 2.
- Liquid Hazardous Waste containing pcb's at a concentration greater than or equal to 50 ppm.
- Liquid Hazardous Waste that is primarily water and contains halogenated organic compounds (HOC's) in total concentration greater than or equal to 1,000 ppm and less than 10,000 ppm.
- Liquid Hazardous Waste, including free liquids associated with any solid or sludge, containing the following metals or compounds of these metals at concentrations at greater than or equal to those specified below:
- | | |
|--|-------------------------|
| — Arsenic (As) 500 ppm | — Mercury (Hg) 20 ppm |
| — Cadmium (Cd) 100 ppm | — Nickel (Ni) 134 ppm |
| — Chromium (Cr ⁶⁺) 500 ppm | — Selenium (Se) 100 ppm |
| — Lead (Pb) 500 ppm | — Thallium (Tl) 130 ppm |
- Liquid Hazardous Waste, including free liquids associated with any solid or sludge, containing free Cyanides at concentrations greater than or equal to 1,000 ppm.

I hereby certify that all information supplied above, and attached is complete and accurate to the best of my knowledge and ability to determine that no omissions or errors exist.

NAME SAM WANG TITLE LAB SAFETY OFFICER

SIGNATURE [Signature] DATE 7/8/88

Back side

NOTIFICATION OF WASTE RESTRICTED FROM LAND DISPOSAL

As a generator of hazardous waste you may be subject to additional responsibilities under the Federal Land Disposal Restrictions promulgated November 8, 1986, for spent solvents (F001-F005), and July 8, 1987 for "California List" wastes, under the Resources Conservation and Recovery Act of 1976, as amended.

A Generator who determines that he is managing a restricted waste under 40 CFR 268 must supply the treatment or disposal facility a notification of such restriction with **each shipment**. The notification must include:

1. The state manifest Document Number associated with the shipment.
2. The USEPA Hazardous Waste Number(s) identifying the waste.
3. The corresponding treatment standard(s) and/or applicable prohibition.

For certain waste shipments destined for land disposal, the notification must also include the certification published in 40 CFR Part 268.7(a) (2) (ii).

This notification is a mandatory attachment to each manifest used for the shipment of a waste restricted under 40 CFR 268. **Please photocopy this form** for use with each shipment of restricted waste.

Material Type: Indicate whether this material is either a restricted spent solvent waste (F001-F005) or a "California List" Waste.

Generator's Name: The name of the Company generating the waste.

Site Address: The site of the facility actually generating the waste.

Gen. EPA ID#: The US EPA ID number assigned to the site actually generating the waste.

Manifest No.: The state manifest document number preprinted on the manifest used to ship the restricted waste.

Line No.: The manifest line number used to describe the waste this certification is completed for. A separate certification should be completed for each Line No. if more than one type of restricted waste is shipped using the same manifest.

T1 Auth. No.: The unique number assigned by T1 to this waste.

Hazardous Waste Number(s): All applicable four digit codes assigned to this material per 40 CFR 261.

NOTE: IT IS VERY IMPORTANT TO REMEMBER THAT FOR ANY WASTE TO BE CLASSIFIED AS A CALIFORNIA LIST WASTE, IT MUST FIRST BE A RCRA REGULATED HAZARDOUS WASTE, AS LISTED OR IDENTIFIED IN 40 CFR PART 261.

Box 1: Check this box if you are the initial generator of a spent solvent waste which does not meet the treatment standard(s) or a "California List" waste which does not meet the prohibition levels. If this box is checked you must also indicate the appropriate treatment standard or prohibition level by checking all applicable standards or prohibitions listed on the lower portion of the form.

Any available analytical data should be attached to the notification if available. Indicate by marking "Yes" or "No" that data is attached.

Box 2: Check this box if the waste material inherently meets the treatment standards for spent solvent wastes or is a spent solvent waste which has already been treated to the treatment standards. This box should also be checked if the material is a "California List" waste which has already been treated to the appropriate prohibition levels. If this box is checked you must also indicate the appropriate treatment standard the spent solvent waste meets, or has been treated to, or the prohibition level the California List waste has been treated to by checking all applicable treatment standards or prohibition levels listed on the lower portion of the form. This box includes a specific certification which must be signed and dated by an employee of the manifested generator in addition to the form certification at the bottom of the form.

Any available analytical data should be attached to the notification if available. Indicate by marking "Yes" or "No" that data is attached.

Box 3: Check this box if the restricted waste material is subject to a case by case extension under 40 CFR 268.5, a petition under 40 CFR 268.6, or a nationwide variance under part 268 subpart C.

TREATMENT STANDARDS/PROHIBITIONS: If Box 1 or Box 2 is marked, you must place a mark adjacent to the appropriate treatment standard(s) or prohibition(s) applicable to the waste.

FORM CERTIFICATION: The name and title of the individual responsible for, and employed by, the manifested generator must be supplied. In addition, this individual must sign and date the form certification.

Attachment 3

Soft Hammer Demonstration/Certification

November 1, 1988

Sam Wang
University of Chicago
5747 S. Ellis Avenue
Chicago, Illinois 60637

Regional Administrator
Region V
230 South Dearborn Street
Chicago, IL 60604

Re: Soft Hammer Demonstration/Certification

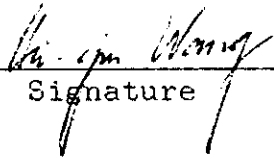
In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, University of Chicago has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(2) for EPA code(s) P030, P087, P120, U007, U009, U044, U053, U130, U134, U151, U188, U219, and U223, for waste stream name laboratory waste.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that the hierarchy of treatment shown on Attachment A will provide the best practically available treatment to reduce the toxicity and mobility of the hazardous constituents.

The review of practically available treatment technologies included a consideration of 1) past treatment practices, 2) a cost ratio that compared the cost of treatment, shipment and disposal versus the cost of shipment and disposal, and finally 3) a treatment hierarchy that included recycling/recovery, chemical treatment, destruction (incineration) and immobilization (stabilization).

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

If any further information is required, please contact me at (312) 702-7051.



Signature

Laboratory Safety
Officer

Title

ATTACHMENT A

First Third "Soft-Hammer" Demonstration

Facility Owner: Treatment One, Division of SET Environmental, Inc., 5743 Cheswood Street, Houston, Texas 77087
Contact: Joyce Bailey, Phone Number (713) 944-9464, Date of Contact 01/11/88.
Treatment Method: 1. Recycling/Recovery, 2. Chemical Treatment, 3. Destruction, 4. Immobilization

Soft-Hammer Waste for Which Alternative Treatment or Recovery has been Located

The following hierarchy will be used to handle all "soft hammer" waste received by Treatment One. Described below is the intended disposal of each "soft hammer" waste (assuming compatibility of waste material with treatment process :

1. Recycling Recovery

- A. Reuse of organic solvents, metallic mercury, and certain metals for recycling/recovery is a practically available technology that yields the greatest environmental benefit.
- B. Fuel Blending is a practically available technology that yields the greatest environmental benefit. This waste has a recoverable heat value can be best reused as a hazardous waste fuel.
- C. "Soft hammer" waste to be handled under recycling/recovery: P001, P004, P005, P016, P012, P018, P020, P036, P037, P039, P041, P048, P050, P058, P059, P068, P069, P070, P071, P082, P084, P087, P089, P092, P094, P097, P108, P110, P115, P120, P122, P123, U007, U009, U010, U012, U016, U018, U019, U022, U029, U031, U036, U037, U041, U043, U044, U046, U050, U051, U053, U061, U063, U064, U066, U067, U074, U077, U078, U086, U089, U103, U105, U108, U115, U122, U124, U129, U130, U137, U151, U154, U155, U157, U158, U159, U171, U177, U180, U185, U188, U192, U200, U209, U210, U211, U219, U220, U221, U223, U226, U227, U228, U237, U238, U248, U249 P081*

2. Chemical Treatment

- A. Chemical treatment is a practically available technology that yields the greatest environmental benefit by eliminating the hazardous characteristics of the material.
- B. "Soft hammer" waste to be handled under chemical treatment: P010, P011, P012, P015, P030, P105, U133, and U134.

3. Destruction

- A. Incineration as the practically available technology that yields the greatest environmental benefit. This material will be repackaged and/or stored at Treatment One then sent off-site for destruction.
- B. All soft hammer waste listed under recycle/recover that cannot be recycled or recovered do to the chemicals physical state will be handled off-site by incineration/destruction.

4. Immobilization

- A. Where no other disposal technology has been developed immobilization is a practically available technology that yields the greatest environmental benefit. Immobilization will reduce the mobility of the hazardous constituents of the waste. Recovery and destruction technologies have been examined and were not found to be practically available due to the concentration of hazardous constituents of the waste.

* Non-explosive mixtures only



Refer to: 0316410001 - Cook County
University of Chicago
ILD005421136
Compliance File

PRE-ENFORCEMENT CONFERENCE LETTER

CERTIFIED MAIL
Return Receipt
P #584 055 387

April 27, 1989

University of Chicago
Attn: Sam Wang
5735 South Ellis Avenue
Chicago, Illinois 60637

Dear Mr. Wang:

On April 26, 1989 a Pre-Enforcement Conference (PEC) was held at the Maywood office of the Illinois EPA. Attending the conference were Sam Wang, Lab Safety Officer, University of Chicago; Clifford Gould, IEPA Land Pollution Control; and Carol Graszer, IEPA Land Pollution Control.

The PEC concerned apparent violations observed during a February 15, 1989 inspection of University of Chicago - Chemistry (U of C).

During this meeting Mr. Wang submitted an inspection schedule which appeared to have resolved the apparent violation 725.115(b).

The University of Chicago agreed to the following:

By May 5, 1989 submit to the Agency a copy of correspondence between U of C and IEPA regarding facility annual reports.

Send to the Agency a copy of the manifest prepared for the next shipment.

Send to the Agency a copy of a completed inspection log which includes the time of the inspection and the name of the inspector.

By May 26, 1989 submit to the Agency U of C's revised contingency plan, which includes a description of arrangements made with local police departments, fire departments and local hospitals; copies of letters concerning the above; personnel responses to fires, explosions or any unplanned release; and evidence of submittal of copies of the plan to police, fire departments and hospitals.

By June 30, 1989 submit to IEPA a revised waste analysis plan which shows how U of C will comply with 725.113(a), 725.117 and 725.277.

All submittals to the IEPA should be sent to:

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

with a copy to:

Illinois Environmental Protection Agency
Division of Land Pollution Control
1701 So. First Avenue, Suite 600
Maywood, Illinois 60153
Attn: Carol A. Graszer

If the Agency does not hear from you within ten (10) calendar days from the date of this letter, the Agency will assume that this document accurately reflects the agreements made during the meeting.

If you have any questions concerning the above, contact Carol Graszer at 312/345-9780.

Sincerely,



Clifford Gould, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

CG:CAG:dfa:0936D

cc: Division File
Northern Region
Carol Graszer
Brian White

21 APR 1989

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sam Wang
Lab-Safety Officer
University of Chicago
5735 South Ellis Avenue
Chicago, Illinois 60637

Re: Notice of Violation
University of Chicago
ILD 005 421 136

Dear Mr. Wang:

On February 5, 1989, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The Land Disposal Restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 268, and 270-271). Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41;
2. Failure to determine whether the waste exceeds treatment standards as required by Section 268.7(a);
3. Failure to provide a separate written notice attached to the manifest for each shipment of F-solvent wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifests number, and waste analysis data, where available, as required by Section 268.7(a)(1);
4. Failure to revise the waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13;

5. Failure to maintain a complete operating record to include 40 CFR Part 268 requirements in accordance with Section 265.73;
6. Failure to identify contents and mark dates on all containers entering storage, as required by section 268.50(a)(2)(i).
7. Failure to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit, as required by 268.8(a)(1); and
8. Failure to submit to Regional Administrator a demonstration and certification containing information that document its efforts to locate practically available treatment, as required by 268.8(a)(2).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA
Glen Savage, IEPA

5HR-12:B. RUSSELL:or:04/06/89:Disk#2:PC FILENAME:SAMWANG

O.R.
4/14/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	B.P. 4/18/89	P.E.D. 4.20.89	

FO5

RCRA LAND DISPOSAL RESTRICTION INSPECTION

OUT BARB
RECEIVED
 MAR 27 1989
 OFFICE OF RCRA
 Waste Management Division
 U.S. EPA REGION V

Facility: University of Chicago
 U.S. EPA I.D. No.: 120 00 5421136 / 0316410001
 Street: 6041 S. Blackstone
 City: Chicago State: IL Zip Code: 60637
 Telephone: (312) 753-0829

mailing address:

Operator: University of Chicago
 Street: 5735 South Ellis Avenue
 City: Chicago State: IL Zip Code: 60637
 Telephone: (312) 702-7051 (312) 753-0829

Owner: University of Chicago (Board of Trustees)
 Street: 5801 South Ellis Ave.
 City: Chicago State: IL Zip Code: 60637
 Telephone: _____

Inspection Date: 2/15/89 Time: 10:00-1:45 pm Weather Conditions: SNOWY 30°

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>CAROL A. GRASER</u>	<u>IEPA</u>	<u>(312) 345-9780</u>
Facility Representatives:	<u>SAM WANG</u>	<u>Lab-Safety Officer</u>	

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status California List</u>	<u>First Third</u>
Generator	<u>X</u>		<u>X</u>	<u>X</u>
Transporter				
Treater	<u>X</u>			
Storer	<u>X</u>		<u>X</u>	<u>X</u>
Disposer				

RECEIVED

MAR 22 1989

IEPA-DLPC

Revised 9-26-88

February 15, 1989
University of Chicago
0316410001

NARRATIVE

The University of Chicago generates hazardous waste in more than 250 laboratories involved in research and instruction. They are located in the Jones Laboratory Complex, the Medical Center and the Cummings Life Science Center. The University stores and treats hazardous waste in the Laboratory Service Building. The facility has recently completed closure activities for a hazardous waste storage unit located in the Jones Laboratory Complex.

Waste generated in the Jones complex is accumulated in room 401 of the complex. The waste is accumulated in containers ranging in size from one ounce to five gallons. All of the containers are labelled identifying their contents. They are accumulated in a cabinet which locks and is labelled "Hazardous Waste". Before waste is brought to room 401, Dr. Wang is contacted and summoned to accept the waste.

Hazardous waste from the Medical Center and Life Science Center is accumulated in the Franklin McLean Research Blockhouse. Waste is accepted in the block house between the hours of 9:00 am - 12:00 noon on Thursdays. The waste is taken to the Laboratory service Building for storage on the same day.

Hazardous Waste Generated

NOTE #1: The following waste streams are organized according to final TSD destinations. Listed wastes are stored according to characteristic.

Ignitables - D001 including numerous listed wastes primarily U220 and U239. Xylene and Toluene are dissolved in radioactive tritium and carbon 14 in the hospital. These wastes are sent to SCA for incineration. Each shipment is analyzed by SCA. 2217 gallons were generated in 1988. The last manifested shipment was 1-27-89.

Corrosives, Ignitables, - D001, D002, D003, D004, D006 and numerous listed Reactive, E.P. Toxic wastes. Generated in the labs. Each shipment is analyzed by SET environmental upon receipt. SET assists the University in lab packing the various wastes prior to shipping off-site. They are sent to Treatment 1 in Texas for treatment and incineration. 4618 gallons were generated in 1988. The last manifested shipment was 7-8-88.

Scintillation Vials - U220, U239. Lab waste vials containing less than 1 cc of Toluene and xylene per vial. Lab packed and shipped to EDCO in Florida. The glass vials are crushed and landfilled. Xylene and Toluene are collected after the glass vials are crushed and incinerated. 80 drums were generated in 1988. The last manifested shipment was 1-23-89.

NOTE #2: For the most part the waste has been manifested according to characteristic without referring to the listed waste USEPA numbers. Land ban notifications have not been accompanying shipments.

INSPECTION SUMMARY

*The generator uses it's knowledge of the Lab. wastes to determine the category of waste. Wastes are identified by characteristic instead of listing on manifests (RCRA NARRATIVE INCLUDED FOR FURTHER EXPLANATION)

LAND BAN VIOLATIONS

- LAND BAN NOTIFICATIONS DO NOT ACCOMPANY SHIPMENTS OF CALIFORNIA LIST AND FIRST THIRD WASTES.
- The generator does not determine the appropriate treatability group of the wastes.
- Waste analysis plan does not specifically cover 1st third and California List wastes. Analysis performed by off site facility and stored according to characteristic.

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes? NO

NA

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	_____	_____	_____	_____	_____
2.	F002	_____	_____	_____	_____	_____
3.	F003	_____	_____	_____	_____	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	_____	_____	_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<u>X</u>	_____	<u>X</u>	_____	_____
Cadmium	100 mg/L	<u>X</u>	_____	<u>X</u>	_____	_____
Chromium VI	500 mg/L	<u>X</u>	_____	<u>X</u>	_____	_____
Lead	500 mg/L	<u>X</u>	_____	<u>X</u>	_____	_____
Mercury	20 mg/L	<u>X</u>	_____	<u>X</u>	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L *no*

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0 *no*

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

*NO PCB'S
handled on site*

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes ~~_____~~ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids) *no*

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____X_____	_____	_____X_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____X_____	_____	_____X_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____X_____	_____	_____X_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020					
P030	X		X		
P036					
P037					
P039					
P041					
P048					
P050	X		X		
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087	X		X		
P089	X		X		
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009	X		X		

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010					
U012	X		X		
U016					
U018					
U019	X		X		
U022					
U029					
U031	X		X		
U036					
U037					
U041					
U043					
U044	X		X		
U046					
U050					
U051					
U053					
U061					
U063					
U064					
U066					
U067					
U074					
U077	X		X		
U078					
U086					
U089					
U103					
U105					
U108	X		X		
U115					
U122	X		X		
U124					

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129					
U130					
U133					
U134					
U137					
U151					
U154	X		X		
U155					
U157					
U158					
U159	X		X		
U171					
U177					
U180					
U185					
U188	X		X		
U192					
U200					
U209					
U210					
U211	X		X		
U219	X		X		
U220	X		X		
U221					
U223					
U226					
U227					
U228	X		X		
U237					
U238					
U248					
U249					

RCRA LAND DISPOSAL RESTRICTION INSPECTION
GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

- _____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
_____ Pharmaceutical wastewater containing spent methylene chloride
_____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

_____ Yes _____ No _____ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

_____ Yes _____ No _____ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

____ Yes ☒ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☒ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
See previous	_____	_____
pages for	_____	_____
1st 3rd	_____	_____
wastes	_____	_____
generated	_____	_____

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

____ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results. _____

- n/a*
- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

_____ Yes _____ No _____ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?
- _____
- _____
- _____

2. California List Wastes

** see land ban inspection summary*

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

_____ Yes ☒ No _____ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No ☒ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes ☒ No _____ NA

If yes, is any supporting data available for review? Describe how this is adequate. Generator knows what each lab waste is - remains relatively unchanged after use

- Testing

☐ Yes ☒ No ☐ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

☐ Yes ☐ No ☒ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

3. First Third Wastes: ** see handwritten narrative for explanation*

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

☐ Yes ☒ No ☐ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☐ Yes ☒ No ☐ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

☐ Yes ☒ No

If yes, is any supporting data available for review? Describe how this is adequate. Generator knows what each lab waste is.

- TCLP

____ Yes X No ____ NA

- Total Constituent Analysis

____ Yes X No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes X No ____ NA

- d. How does the generator test the waste when a process or waste stream changes?

LAB WASTES - waste varies but
remains relatively unchanged after use.
Knowledge of waste is used.

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

X Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

X Yes ____ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

____ Yes X No

- c. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No
 Applicable treatment standards ☐ Yes ☐ No
 Manifest number ☐ Yes ☐ No
 Waste analysis data, if available ☐ Yes ☐ No

Identify off-site treatment or storage facilities: SCA, Treatment
One (Texas), EDCA (Florida)

- d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

- e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☒ No

- f. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No
 Applicable treatment standards ☐ Yes ☐ No
 Manifest number ☐ Yes ☐ No
 Waste analysis data, if available ☐ Yes ☐ No
 Certification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: _____

- g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☐ NA

- h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

NO
NOTIF.

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☐ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

NO Soft
Hammer
wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

☐ Yes ☒ No

per
Carol
Graster
4/12/89

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted? ☐ Yes ☒ No

Addresses ☐ Yes ☒ No

Telephone Numbers ☐ Yes ☒ No

Contact dates ☐ Yes ☒ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☒ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes ~~_____ No~~

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☐ No ☒ NA

o California List ☐ Yes ☒ No ☐ NA

o First Third ☐ Yes ☒ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues? *WASTE ANALYSIS PLAN STATES THAT WASTES ARE ANALYZED BY DISPOSAL CONTRACTOR, STORED ACCORDING TO CHARACTERS.*

☒ Yes ☐ No *if required*

- a. What date was the waste analysis plan last revised? 11-8-88

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: SCA Incinerator, EDCA (FIA)
SET ENVIRONMENTAL

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☐ No ☒ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☒ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: USE KNOWLEDGE OF WASTES

See Narrative



3. Are the operating records, including analyses and quantities, complete [264.73/265.73]? *performed by off site disposal contractors.* TSD

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☐ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

Containers are marked with contents
but not dated - size ranges from 1 oz - 5 gallons.
Dates are recorded in operating record

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☐ Yes ☒ No

Notifications not made

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ☒ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No ☒ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ☒ No

If no, go to D, Treatment in Surface Impoundments.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
LAND POLLUTION CONTROL/FOS

VIOLATION CORRELATION SHEET

SUMMARY OF VIOLATIONS				INSPECTION CHECKLIST		PECL/CIL		COMMENTS	
VIOLATIONS	VIOLATIONS	NARRATIVE							
725,115b	x	x		x		x		NO INSPECTION SCHEDULE	
725,115d	x	x		x		x		No time on inspection log	
725,113a								or name of inspector	
725,137a	x	x		x		x		Arrangements w/ fire	
								police not made	
725,132a	x	x		x		x		Contingency plan does not	
								describe actions for fire	
								explosions	
725,152c	x	x		x		x		Arrangements w/ police	
								fire not made	
725,153b	x	x		x		x		Copies of contingency	
								plan have not been submitted	
								to police, fire, hospital etc.	
725,175	x	x		x		x		Annual report not filed	
								for 1987. SOI not included	
								In annual reports for	
								1986 + 1985	
722,111	x	x		✓		x		Not making correct determin.	
								listed wastes are being	
								manifested by their characteristics	

*NOTE: Include in Inspection Packet

(over)

725, 113(b) Your waste analysis plan does not include
listed hazardous wastes.

Summary ☒
narrative ☒
checklist ☒
PEC ☒

2/1/81

✓

3

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address

2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Sam Wang, Ph.D.
The University of Chicago
5801 S. ELLIS Ave.
Chicago, IL 60637

4a. Article Number

P 564 478 020

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery**5. Signature (Addressee)**

Sam Wang

6. Signature (Agent)**8. Addressee's Address (Only if requested and fee is paid)**

PS Form 3811, November 1990 ★ U.S. GPO: 1991-287-066

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address.

↑(Extra charge)↑

2. ☐ Restricted Delivery

↑(Extra charge)↑

3. Article Addressed to:

Mr. Sam Wang
Lab-Safety Officer
University of Chicago
5735 South Ellis Avenue
Chicago, Illinois 60637

4. Article Number

P 155 069 729

Type of Service:

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature — Addressee

X

6. Signature — Agent

X

7. Date of Delivery

4-24-89

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1987

★ U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

Copy to John Doe
Copy to Henry R.

THE UNIVERSITY OF CHICAGO

CHICAGO • ILLINOIS 60637

DEPARTMENT OF CHEMISTRY

5735 SOUTH ELLIS AVENUE

KENT CHEMICAL LABORATORY • GEORGE HERBERT JONES LABORATORY

SEARLE CHEMISTRY LABORATORY

May 20, 1981

Mr. Karl J. Klepitsch, Jr.
Chief, Waste Management Branch
Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Ref: EPA I.D. ILT 1800-19838

Dear Mr. Klepitsch:

As required by 40 CFR 262.42, I write to inform you that The University of Chicago has not yet received the return copy of its manifest to acknowledge receipt and acceptance of sixty-three 55 gallon steel drums containing packaged hazardous chemical waste that were consigned to S.E.T. Liquid Waste Systems, Inc. on February 24, 1981 for delivery to U.S. Ecology in Beatty, Nevada for landfill burial.

We have not been informed that a landfill permit would not be issued for the burial of the aforementioned hazardous chemical waste, and we are advised by S.E.T. Liquid Waste Systems, Inc. that our inventory list and permit request were submitted promptly to U.S. Ecology. For reasons unknown to us S.E.T. Liquid Waste Systems, Inc. have not been given approval to transport our shipment to Beatty, Nevada.

We are assured by S.E.T. Liquid Waste Systems, Inc. that they have diligently sought alternative means for the proper disposal of our hazardous chemical wastes, including:

- 1) Landfill burial by Waste Management of Alabama and
- 2) Incineration by Trade Waste Incineration at a site near East St. Louis, Illinois.

We are assured by Liquid Waste Systems, Inc. that our shipment is secure in storage at their Wheeling, Illinois facility, and will be transported by them to one of the three sites referred to above when a permit is issued.

RECEIVED

MAY 21 1

WASTE MANAGEMENT BRANCH
EPA, REGION 7

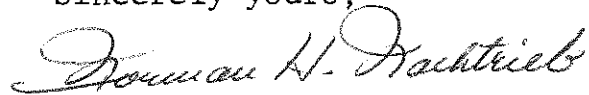
MAY 22 1981

May 20, 1981

Page 2

We have exhausted all means known to us for the proper disposal of our chemical waste, and believe that S.E.T. Liquid Waste Systems, Inc. has likewise done everything in its capacity as our transporter to accomplish this under the RCRA regulations.

Sincerely yours,

A handwritten signature in cursive script that reads "Norman H. Nachtrieb".

Norman H. Nachtrieb
Professor of Chemistry and
University Laboratory Safety
Officer

NHN:hp

cc: David Schuurman
S.E.T. Liquid Waste Systems, Inc.

Please add
certificate
of service for.

[Handwritten signature] *draft*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

THE UNIVERSITY OF CHICAGO
5801 SOUTH ELLIS AVENUE
CHICAGO, ILLINOIS 60637

EPA I.D. No. ILD 005 421 136

)
)
) DOCKET No.

) COMPLAINT,
) FINDINGS OF
) VIOLATION AND
) COMPLIANCE
) ORDER

COMPLAINT

1 1. This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. § 6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 C.F.R. Part 22. The Complainant is the Associate Director, Office of RCRA, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is The University of Chicago, 5801 South Ellis Avenue, Chicago, Illinois 60637.

2 2. This Complaint is based on information contained in *the* U.S. EPA files.

3 3. Pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a)(1), and based on the information cited above, it has been determined that The University of Chicago has violated Subtitle C of RCRA, Section 3005(e), 42 U.S.C. § 6925 and 40 C.F.R. 270.72(a)(1). *Q*

[Handwritten signature]

JURISDICTION

4. Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA, 42 U.S.C. §§ 6912(a)(1), 6926(b), and 6928 respectively. U.S. EPA has promulgated regulations codified at 40 C.F.R. Parts 260 through 271 governing generators and transporters of hazardous wastes and facilities that treat, store and dispose of hazardous waste. Specifically, U.S. EPA has authority in matters related to the toxicity characteristic (TC) rule contained in 40 C.F.R. Part 261.

5. Pursuant to Section 3006(g) of RCRA, 42 U.S.C. § 6926(g), U.S. EPA must implement any new requirements promulgated pursuant to the (Hazardous and Solid Waste Amendments of 1985) (HSWA) within a state until such time as that state is authorized to carry out the new requirements. The TC rule ^{toxicity characteristic} was promulgated pursuant to HSWA, Sections 3001(g) and (h) of RCRA and became effective on September 25, 1990. The State of Illinois does not yet have authorization to implement the TC rule. This complaint, accordingly, seeks to enforce federal regulations. Notice to the State of Illinois was issued on September 26, 1991.

FINDINGS OF VIOLATION

1 ~~6.~~ Respondent ^{the university of chicago} is a person, as defined by Section 1004(15) of RCRA, 42 U.S.C. § 6903(15), who owns and operates a facility at 5801 South Ellis Avenue, Chicago, Illinois 60637 that generates and stores hazardous waste. ~~2. Respondent was in existence on or before November 19, 1980.~~ Respondent is an Illinois corporation whose registered agent is Arthur Sussman, 5801 South Ellis Avenue, Chicago, Illinois 60637.

2 ~~7.~~ Section 3005(a) of RCRA requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage or disposal facility to obtain a RCRA permit. ~~1.~~ The regulations published by U.S. EPA in fulfillment of Section 3005(a)'s mandate are codified at 40 C.F.R. Parts 270, ~~and 271 (formerly Parts 122 and 123).~~ When published, these regulations provided, inter alia, that persons who treated, stored or disposed of listed hazardous waste were required to submit Part A of the permit application no later than November 19, 1980. See 40 CFR 270.10(e). ~~3.~~

3 ~~8.~~ Section 3005(e) of RCRA provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition on the permit application provided that: (1) the facility was in existence on November 19, 1980, or on the effective date of regulatory changes that render a facility subject to permit requirements; (2) the

requirements of Section 3010(a) of RCRA concerning notification of hazardous waste activity have been complied with; and (3) an application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 C.F.R. Part 270.

9) 9. On November 19, 1980, Respondent filed Part A of the permit application with U.S. EPA pursuant to Section 3005 of RCRA. On September 25, 1990, Respondent was operating under interim status with regard to those wastes listed in Respondent's permit application.)

5) 10. On March 29, 1990, U.S. EPA promulgated the HSWA-mandated TC rule to replace the Extraction Procedure (EP) Toxicity characteristic test for the identification of hazardous waste. The TC rule added twenty-five (25) new organic constituents to the original fourteen (14) regulated EP constituents. Four of the new constituents were benzene, carbon tetrachloride, chloroform and trichloroethylene. These wastes have been identified and listed as hazardous wastes under Section 3001 of RCRA (U.S. EPA Hazardous Waste Nos. D018, D019, D022 and D040).

6) 11. On or before September 25, 1990, Respondent was generating and storing hazardous wastes which exhibit the toxicity characteristics for benzene, carbon tetrachloride, chloroform and trichloroethylene.

12. Under the TC rule, facilities operating under interim status and handling newly-regulated TC waste were required to submit an amended Part A application on or before September 25, 1990.

13. Respondent failed to submit to U.S. EPA an amended Part A permit application reflecting the new waste codes for benzene, carbon tetrachloride, chloroform and trichloroethylene (D018, D019, D022 and D040) by September 25, 1990.

15. Respondent submitted an amended Part A permit application reflecting such waste codes on November 30, 1990.

16. U.S. EPA issued Respondent a permit to operate a hazardous waste storage facility *for, inter alia, the storage of hazardous wastes including D018, D019, D022, and D040.* on July 15, 1991.

COMPLIANCE ORDER

Respondent having been determined to be in violation of the above-cited rules and regulations, the following Compliance Order is entered pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928:

A. Respondent shall maintain compliance with all aspects of the permit issued to it by U.S. EPA on July 15, 1991.

B. Respondent shall pay any penalty assessed against it as a result of its failure to submit on a timely basis an amended Part A permit application.

C. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order or any part thereof. This notification shall be submitted no later than to

WITHIN (15) FIFTEEN DAY

For a full 12 days a date

K

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the U.S. EPA, Region V, Waste Management Division, 77 W. Jackson
Blvd., Chicago, IL 60604-3590. Attn: Barbara Russell, RCRA
Enforcement Branch, ~~SHR-12~~. *HRE-85*
↑ Barbara - full in your mail code

A copy of these documents and all correspondence with U.S.
EPA regarding this Order shall also be ^{sent} to Scott Phillips, Senior
Attorney, Illinois Environmental Protection Agency, 2200
Churchill Road, Springfield, Illinois 62706.

Notwithstanding any other provision of this Order, an
enforcement action may be brought pursuant to Section 7003 of
RCRA or other statutory authority where the handling, storage,
treatment, transportation or disposal of solid or hazardous waste
at this facility may present an imminent and substantial
endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In light of the above determination and in consideration of
the seriousness of the violations cited herein, the potential
harm to human health and the environment and the ability of the
Respondent to pay penalties, the Complainant proposed ^{to} to assess a
civil penalty in the amount of fifty-three thousand and ten
dollars (\$53,010.00) against the Respondent, The University of
Chicago, pursuant to Sections 3008(c) and 3008(g) of RCRA, 42
U.S.C. § 6928. Attachment 1 of the Complaint provides a detailed
summary of the proposed civil penalty. Payment shall be made by
certified or cashier's check made payable to the Treasurer of the

United States of America and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. The facility name and docket number shall be provided with such payment. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (SMP-14) and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (CS-3T), U.S. EPA, 77 West Jackson Blvd., Chicago, Illinois 60604-3590.

*NY-105, Barbara
Bill in
New
mail
code*

Failure to comply with any requirement of the Order shall subject the above-named Respondent to liability for a civil penalty of up to twenty-five thousand dollars (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed penalty. Unless Respondent has filed an Answer not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator, Respondent must file a written Answer to this Complaint with the

*Barbara - sent mail
(MF-105) code*

Regional Hearing Clerk, Planning and Management Division, U.S. EPA Region V, 77 W. Jackson Blvd., Chicago, Illinois 60604-3590, within thirty (30) days of receipt of this notice. A copy of Respondent's Answer and any subsequent documents filed in this action should be sent to Eileen L. Furey, Assistant Regional Counsel (CS-3T) at the same address. Failure to answer within thirty (30) days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of the penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §§ 3701 et seq.

Respondent's Answer should clearly and directly admit, deny or explain each of the factual allegations of which Respondent has knowledge. The Answer should contain: (1) a definite statement of the facts which constitute the grounds of defense; and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

SETTLEMENT CONFERENCE

*move to
next page*

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business.

Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty (30) day time limit for responding to this Compliant or the thirty (30) day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Barbara Russell, RCRA Enforcement Branch (5HR-12), at the address cited above, or by calling her at (312) 353-7922.

Dated this ____ day of July, 1992.

Norman, R. Neidergang

William E. Muno
Associate Director, Office of RCRA
Waste Management Division
Complainant

~4mg

*Barbara Russell -
your
mail
copy*

HRE-85

duff

HRE-8J

*Barbara -
is this
Jill Munn's
mail code?*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Arthur Sussman
Registered Agency for
The University of Chicago
5801 South Ellis Avenue
Chicago, Illinois 60637

Re: Complaint, Findings of
Violation and Compliance Order
EPA I.D. No.: ILD 005 421 136*

Dear Mr. Sussman:

Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by your facility of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Section 6901 et seq., based on information in our files about your facility located at 5801 South Ellis Avenue, Chicago, Illinois. The Complaint states the reasons for such determination. In essence the Respondent, the University of Chicago, failed to submit on a timely basis an amended Part A application with the United States Environmental Protection Agency (U.S. EPA) and was therefore storing hazardous waste without authorization to do so. This Complaint is issued pursuant to Section 3008 of RCRA, 42 U.S.C. Section 6928. Accompanying this Complaint is a Notice of Opportunity for Hearing.

Should you desire to contest the Complaint, a written request for a hearing is required to be filed with the Regional Hearing Clerk, United States Environmental Protection Agency, 77 W. Jackson Blvd., Chicago, Illinois 60604-3590, within thirty (30) days from receipt of this Complaint. A copy of your hearing request should also be sent to Eileen L. Furey, Assistant Regional Counsel, Office of Regional Counsel (CS-3T), U.S. EPA, at the above address.

Regardless of whether you choose to request a hearing within the thirty (30) day time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement, please contact Barbara Russell, U.S. EPA, Region V, RCRA Enforcement Branch (HRE-8J), 77 W. Jackson Blvd., Chicago, Illinois 60604-3590, (312) 353-7922.

Sincerely,

^{R.}
Norman Nedergang, Acting

~~William E. Muno~~, Associate Division Director
Office of RCRA
Waste Management Division

Enclosure

cc: William Child, IEPA
William Radlinski, IEPA
Glen Savage, IEPA

bcc: Regional Hearing Clerk (~~EST~~)
Ani to Perry → ~~Jean Sharp~~, Office of RCRA (HRE-8J)
Robert Small, OWPE (OS-520)
IL Permit Section (~~HCP-8J~~)

MIF-105

*Barbara -
make sure
these are
the current
CC's and
insert mail
codes*



Krista G. Cooley

Associate Director

Environmental Health and Safety

The University of Chicago

Risk Management, Audit and Safety

6054 South Drexel Avenue, Room 214, Chicago, Illinois 60637

Office: (773) 834-1133 • Fax: (773) 702-6546

E-mail: kcooley@uchicago.edu

Website: <http://safety.uchicago.edu>